CEQA INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

COUNTY OF ORANGE WORKFORCE REENTRY CENTER PROJECT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION NO. PP-24-0119

Prepared for:

County of Orange
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June 2025

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
af	acre-feet
animal shelter	Dr. John H. Bower Animal Shelter
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
Basin	South Coast Air Basin
bgs	below ground surface
BMPs	best management practices
BRA	Biological Resources Assessment
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards Code
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
Caltrans Manual	Caltrans Transportation and Construction Vibration Guidance Manual
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act

cf	cubic feet
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
CIWMP	Countywide Integrated Waste Management Plan
CMU	concrete masonry unit
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CORTESE	Hazardous Waste and Substance Site List
County	County of Orange
CRECs	Controlled Recognized Environmental Conditions
CWA	Clean Water Act
cy	cubic yards
DAMP	2007 Drainage Area Management Plan
dB	decibel(s)
DCV	design capture volume
DOC	California Department of Conservation
DWR	Department of Water Resources
EDR	Environmental Data Resources, Inc.
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
EVCS	electric vehicle charging station

FAR	floor-to-area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration's
GHG	greenhouse gas
gigawatt hours	gigawatt-hours
GSP	Groundwater Sustainability Plans
GWP	global warming potential
H.I.R.E.	Hub for Integration, Reentry and Employment
HCM	Highway Capacity Manual
HDPE	high-density polyethylene
HFCs	hydrofluorocarbons
HHRA	Human Health Risk Assessment
HRECs	Historical Recognized Environmental Conditions
HVAC	heating, ventilation, and air conditioning
ICU	intersection capacity utilization
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
kW	kilowatt(s)
kWh	kilowatt-hours
L_{dn}	day-night average level
L_{eq}	equivalent continuous sound level
LID	low impact development

L_{max}	maximum noise level
LOS	level of service
LRA	Local Responsibility Area
LST	localized significance threshold
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
mgd	million gallons per day
MLD	Most Likely Descendant
MRZ	Mineral Resource Zone
MS4 Permit	NPDES Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062
MT CO_2e	metric tons of carbon dioxide equivalents
MWDOC	Municipal Water District of Orange County
MWRS	Medlin Workforce & Reentry Solutions
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NF_3	nitrogen trifluoride
NHMLAC	Natural History Museum of Los Angeles County
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OCFCD	Orange County Flood Control District
OCFD	Orange City Fire Department
OCSD	Orange County Sanitation District

OC Sheriff	Orange County Sheriff's Department
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
OCWR	OC Waste & Recycling
OPD	Orange Police Department
Paleontological Resources Memorandum	Paleontological Resources Memorandum for the Workforce Reentry Project
PFCs	Perfluorocarbons
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Preliminary Geotechnical Report	Preliminary Geotechnical Report Workforce Reentry Center 561 The City Drive South
PRIMP	Paleontological Resources Impact Mitigation Program
project	Workforce Reentry Center Project
PS&E	plans, specifications, and estimates
pWQMP	Preliminary Water Quality Management Plan
RCM	Regulatory Compliance Measure
RECs	Recognized Environmental Conditions
RMS	root-mean-square
ROGs	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SC	Standard Condition

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
sf	square foot/feet
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SMP	Soil Management Plan
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SO_X	sulfur oxides
SP	Summary Plan
sq mi	square mile
SR-	State Route
SRA	Source Receptor Area
SVP	Society of Vertebrate Paleontology
SWEEPS UST	Statewide Environmental Evaluation and Planning System Underground Storage Tank Listing
TIA	Transportation Impact Assessment
TPA	Transit Priority Area
tpd	tons per day
TPH	total petroleum hydrocarbons
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan

V/C	volume to capacity
VdB	vibration velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WQMP	Water Quality Management Plan

Chapter 1: Introduction

This Initial Study evaluates the potentially significant environmental impacts associated with implementing the proposed project. The Initial Study is organized into the following chapters:

- Chapter 1: Introduction
- Chapter 2: Environmental Determination
- Chapter 3: Project Description
- Chapter 4: Environmental Evaluation
- Chapter 5: Mitigation Monitoring and Reporting Program
- Chapter 6: References

1.1 Project Title

County of Orange Workforce Reentry Center Project

1.2 Lead Agency Name | Address

County of Orange
County Executive Office/Real Estate/Land Development
400 W. Civic Center Drive, 5th Floor
Santa Ana, CA 92701

1.3 Lead Agency Contact Person | Telephone Number | Email

Ryan Rigali, Real Estate Manager
Telephone: 714-834-3763
Email: ryan.rigali@ocgov.com

1.4 Project Location

The proposed Workforce Reentry Center Project (project) would be at 561 The City Drive South in of Orange, Orange County.

Figure 3-1, Regional Location (provided in Chapter 3, Project Description), depicts the proposed project within the regional context while Figure 3-4, Existing Land Uses (Chapter 3), depicts the proposed project within a local context.

1.5 Project Sponsor's Name | Address

County of Orange
County Executive Office/Real Estate/Land Development
400 W. Civic Center Drive, 5th Floor
Santa Ana, CA 92701

1.6 General Plan | Specific Plan Designation(s)

City of Orange General Plan Land Use Designation: Public Facilities and Institutions (PFI) and General Commercial (GC)

1.7 Zoning District(s)

City of Orange Zoning Designation: Public Institution (P-I) and Limited Business (C-1)

1.8 Description of Project

The County of Orange (County) proposes to develop a Workforce Reentry Center (project) on an approximately 4.6-acre property at 561 The City Drive South in Orange, California (Assessor's Parcel Numbers 231-091-02, 231-091-03, 231-091-07, 231-091-09, and 231-271-02). The proposed project would provide transitional housing and vocational training for adult individuals involved in the criminal justice system or other County systems of care to facilitate their transition into the workforce. The proposed project would develop the project site with three buildings: a 37,200-square-foot office/vocational building, a 16,166-square-foot retail/culinary building, and a 26,998-square-foot supportive housing and services building. Ancillary site improvements would include utility infrastructure connections/relocations, landscaping, and hardscaping, including surface parking and a new internal circulation roadway. Minor off-site improvements are proposed for The City Drive South and West Metropolitan Drive to improve vehicular access to the project site, including traffic signal modifications, restriping, and median modifications. Construction activities associated with the proposed project would include excavation reaching a maximum depth of 16 feet below ground surface.

1.9 Surrounding Land Uses and Setting

The approximately 4.6-acre property on which the proposed project would be located (the "project site") is currently vacant following the demolition in April and May of 2025 of structures to grade associated with a formerly operational County animal shelter. As such, the existing setting of the site for the proposed project consists of a disturbed vacant lot. A portion of the project site also consists of a recreational field associated with the adjacent Theo Lacy Facility, which would be removed and developed under the proposed project.

The project site is bounded by the Santa Ana River to the east, the Theo Lacy Facility to the north, a vacant strip of State-owned land and State Route (SR-) 22 to the south, and The City Drive South to the west. Directly east of the project site and parallel to the Santa Ana River Channel and Trail is a vehicle storage lot with vehicles and shipping containers. The Theo Lacy Facility is a County operated, 11-acre, maximum security adult jail complex behind a security perimeter to the direct north of the project site. Across The City Drive South are several restaurants, the Outlets at Orange mall, and associated surface parking.

1.10 Other Public Agencies Whose Approval is Required

Table 1.A, below, provides a list of required and anticipated public agency approvals that are associated with the proposed project.

Table 1.A: Public Agency Approvals

Body	Action
County of Orange	● Adoption of the California Environmental Quality Act (CEQA) Final Initial Study with Mitigated Negative Declaration (IS/MND) ● Board of Supervisors Approval of Development Agreement with Guaranteed Maximum Price, Construction Agreement with State, Ground Lease, Right of Entry for Construction and Operation, Easement Agreement, Construction Contract, and Facility Sublease ● Approval of Water Quality Management Plan (WQMP) ● Approval of Plans, Specifications, and Estimates (PS&E) ● Temporary Construction Easements, if necessary
Santa Ana Regional Water Quality Control Board	● National Pollutant Discharge Elimination System (NPDES) Construction General Permit ● Section 401 Water Quality Certification
State Fire Marshal	● Plans and Specifications
City of Orange	● Fire Inspections – Site Access Only ● Approval of Off-Site/Traffic Signalization Improvements ● Tree Preservation Permit for trees within The City Drive South median, if applicable
Various Utility Companies	● Encroachment Permits ● Easements

1.11 California Native American Consultation

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The County mailed initial consultation notification letters on February 20, 2025, to the following California Native American Tribes pursuant to Assembly Bill (AB) 52:

- Gabrieleño Band of Mission Indians - Kizh Nation
- Juaneño Band of Mission Indians
- Gabrieleño Tongva San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians

Tribal consultation is still ongoing. Refer to Section 4.22, Tribal Cultural Resources, of this Initial Study/Mitigated Negative Declaration (IS/MND) for further discussion.

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Chapter 2: Environmental Determination

Based on the analysis conducted in this Initial Study, the County of Orange, as the Lead Agency, has made the following determination:

Table 2.A: Environmental Determination

I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.	☐
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.	☒
I find that the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.	☐
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the *State CEQA Guidelines* and the County's adopted Local CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project which are documented in this addendum to the earlier CEQA document (CEQA §15164).	☐
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.	☐

DocuSigned by:
Cindy Salazar
5CF656B25562407...
Signature

5/29/2025
Date

Cindy Salazar
Printed Name

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Chapter 3: Project Description

3.1 Introduction

The County of Orange (County) proposes to construct three buildings with associated hardscaping and outdoor gathering areas within an approximately 4.6-acre property (project site) at 561 The City Drive South in Orange, Orange County. This development would comprise the Workforce Reentry Center (project), which would provide vocational training and transitional housing for individuals involved in the criminal justice system or other County systems of care. The County is both the Lead Agency and the Project Applicant for the proposed project.

The three proposed buildings would include a two-story, 37,200 square-foot (sf) vocational/office building; a one-story, 16,166 sf retail/culinary building; and a two-story, 26,998 sf supportive housing and service building. The housing building would provide on-site housing for 52 program participants and 2 on-site managers. The proposed project would include two outdoor pet training and relief areas, an outdoor activity area for program participants, an outdoor herb/vegetable garden and additional landscaped areas, a security block wall between the project site and adjacent Theo Lacy Facility, and 171 surface parking spaces, including 7 standard electric vehicle (EV) charging spaces. The project site, including surface parking, would be accessed from The City Drive South. Off-site roadway improvements totaling approximately 2.3 acres are proposed for The City Drive South and West Metropolitan Drive just beyond the project site to improve access to the proposed facility.

3.2 Environmental Setting and Surrounding Land Uses

The project site is within the city of Orange, which is bordered by the cities of Anaheim, Santa Ana, Garden Grove, and Villa Park, as well as unincorporated areas of the County. Figure 3-1, Regional Location, depicts the location of the project site in the context of the overall region. The project site is composed of five parcels, Assessor's Parcel Numbers 231-091-02, 231-091-03, 231-091-07, 231-091-09, and 231-271-02, and is bounded by the Santa Ana River to the east, the Theo Lacy Facility to the north, a vacant strip of State-owned land and State Route (SR-) 22 to the south, and The City Drive South to the west. Directly east of the project site and parallel to the Santa Ana River Channel and Trail is a vehicle storage lot with vehicles and shipping containers. The Theo Lacy Facility is a County-operated, 11-acre, maximum security adult jail complex behind a security perimeter to the direct north of the project site. Across The City Drive South are several restaurants, the Outlets at Orange mall, and associated surface parking.

A cell phone tower is present on the project site, which is planned for relocation on the project site prior to construction of the proposed project. Specifically, the existing cell tower would be demolished and replaced farther west on the project site, closer to The City Drive South from its existing position and would remain along the same existing Southern California Edison easement that runs in an east-west orientation within the southern portion of the project site. The new cell tower enclosure is pending design review with the cell tower tenant. The existing cell tower is disguised as a faux tree, although the replacement cell tower may reflect an alternate design. During project construction, the cell tower tenant would likely have a carrier on wheels or other temporary cell tower on site to support the project site during demolition of the existing cell tower and construction of the replacement cell tower. This demolition would be carried out independently by the cell tower tenant prior to construction of the proposed project and therefore is not a part of the proposed project.

A portion of the project site includes part of an underutilized recreation yard associated with the Theo Lacy Facility, which contains two Orange County Water District (OCWD) monitoring wells. However,

OCWD's license agreement to use the property terminated on January 7, 2000. Per the license agreement, OCWD is responsible for the abandonment and removal of the wells. Although well removal is slated to take place concurrently with construction of the proposed project, it would be carried out independently under a separate process, as it is required to be carried out regardless of whether the proposed project takes place. As such, this well removal, similar to the cell tower relocation, is not included as a part of the proposed project.

The County previously operated the Dr. John H. Bower Animal Shelter (animal shelter) on the project site. The animal shelter began operations in the mid-1970s and permanently closed in 2018. Structures and infrastructure associated with the animal shelter were still present on the project site at the time preparation of this document was initiated. This includes two buildings, outdoor animal kennels, two cat housing/supply trailers, and parking lots. As detailed below, these structures have since been demolished under a separate project following issuance of a ministerial permit.

Since the animal shelter closed in 2018, the abandoned buildings and associated infrastructure deteriorated due to natural and anthropogenic causes. According to the Orange County Sheriff's Department (OC Sheriff), numerous instances of trespassing occurred on the project site. As a consequence, trash and debris accumulated on portions of the site, and there were several instances of vandalism by individuals trespassing and squatting on the property.[1] Reports of broken windows on the second floor of one of the shelter administration buildings and breaches in the existing fencing that secures the shelter site were filed with the OC Sheriff.[2] OC Public Works also identified instances of vandalism to abandoned electrical infrastructure on and adjacent to the shelter property.[3] Additionally, deputies at the Theo Lacy Facility guard station filed complaints with the County of Orange Mosquito and Vector Control District regarding potential mosquito infestation at the animal shelter due to an accumulation of standing water and overgrowth of weeds on the project site, providing mosquito habitat.[4] Due to these issues, the abandoned animal shelter structures were considered a public nuisance and health emergency that required abatement in the form of demolition.

A demolition permit for this nuisance abatement project was ministerially approved by the County on April 1, 2025.[5] As such, the demolition was exempt from analysis under the California Environmental Quality Act (CEQA). Demolition activities began in April 2025 and continued over the span of approximately 6 weeks, concluding in May 2025.

This separate demolition project was limited to the removal of above-grade structures and did not involve any ground-disturbance activities. Building components such as footings, utilities, and pavement remain in place on the project site and would require demolition and removal prior to construction of the proposed project. As such, the existing condition for the proposed project consists of a vacant, disturbed, relatively flat lot.

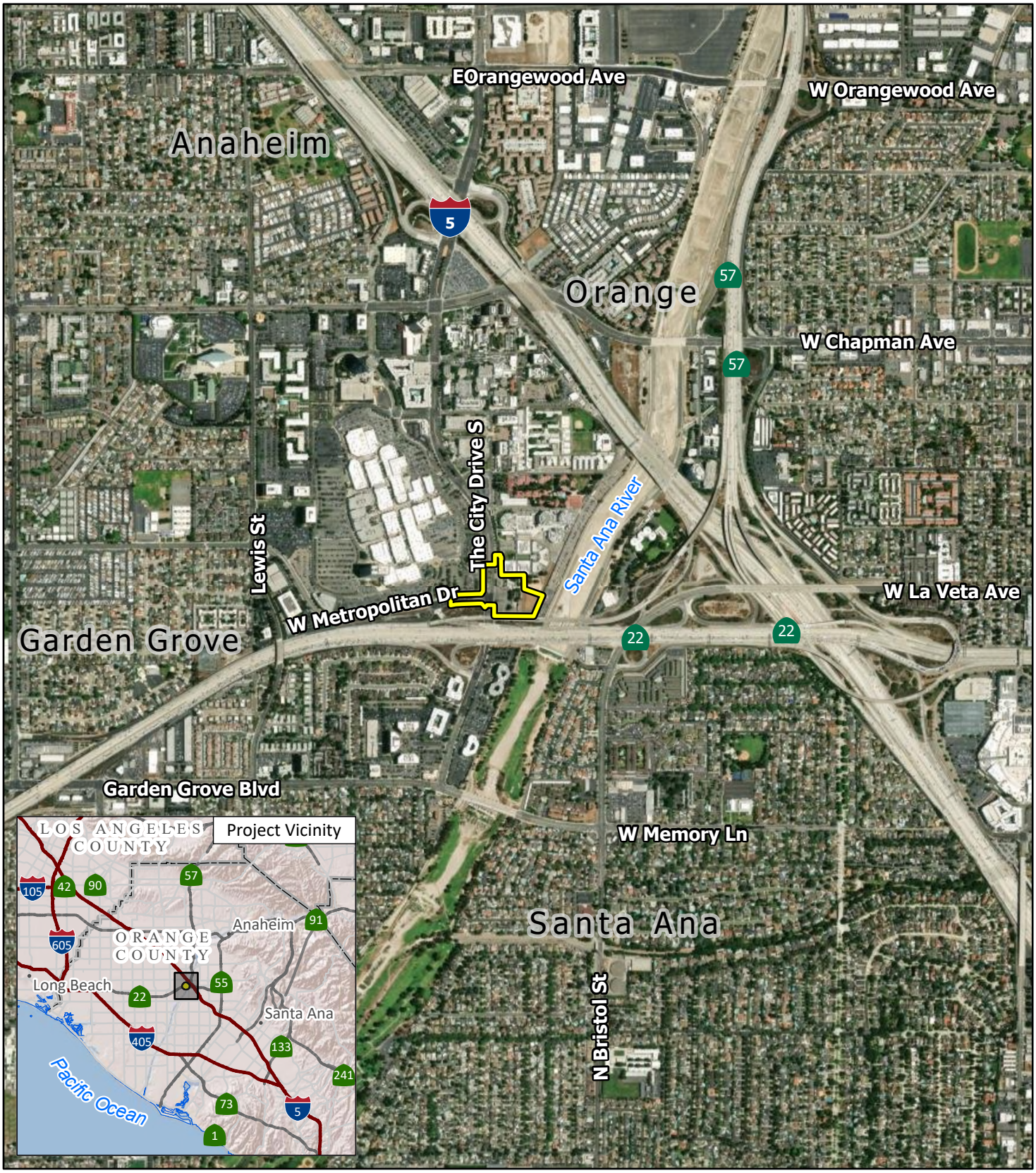
1 Ninyo & Moore. 2024. Phase I Environmental Site Assessment, October.

2 Personal communication via email between Ryan Rigali, Orange County Executive Office, and representatives of the Orange County Sheriff's Department, March 4, 2025.

3 Email communication between Ryan Rigali, Orange County Executive Office, and representatives of OC Public Works, March 4, 2025.

4 Personal communication via email between Ryan Rigali, Orange County Executive Office, and representatives of the Orange County Sheriff's Department, March 4, 2025.

5 This demolition permit was issued as part of a separate project with independent utility from the proposed project.



LSA

Project Site

City Boundary

FIGURE 3-1

N

0 750 1500

FEET

SOURCE: Esri Imagery (Jan 29, 2024)

I:\O\OCY2001.51\GIS\Pro\County of Orange Workforce Reentry Center Project.aprx (2/4/2025)

County of Orange Workforce Reentry Center Project

Regional Location

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Figure 3-2, General Plan Land Uses, shows the City's General Plan land use designations for the project site and its immediate vicinity. According to the City's General Plan Land Use Element,[6] the project site is designated for Public Facilities and Institutions (PFI) and General Commercial (GC) land uses. While a small portion of the western end of the project site overlaps with the Urban Mixed-Use (UMIX) designation, the only proposed improvements in this area are roadway striping improvements. The PFI land use designation provides for several types of public, quasi-public, and institutional land uses, including schools, colleges and universities, city and county facilities, hospitals, and major utility easements and properties. This land use designation includes service organizations and housing-related institutional uses, such as dormitories, employee housing, assisted living, convalescent homes, and skilled nursing facilities. The GC land use designation provides for a range of retail and service commercial uses and professional offices.

Figure 3-3, Zoning, depicts the City's zoning of the project site and surrounding areas. According to the City's Zoning Code,[7] the project site is currently zoned as Public Institution (P-I) and Limited Business (C-1). The P-I zoning district is intended to accommodate a wide range of public and quasi-public uses that need special consideration and may accommodate housing and privately operated medical and office activities. The C-1 zoning district permits lower intensity office, general retail, and service commercial businesses.

The proposed project would develop institutional, commercial, and residential uses within the project site with new buildings and would remain compatible with the existing applicable land use or zoning regulations. Table 3.A, On-Site and Adjacent Land Uses, summarizes the surrounding land uses, General Plan designations, and zoning. Figure 3-4, Existing Land Uses, illustrates the locations of these nearby land uses as they relate to the project site.

Table 3.A: On-Site and Adjacent Land Uses

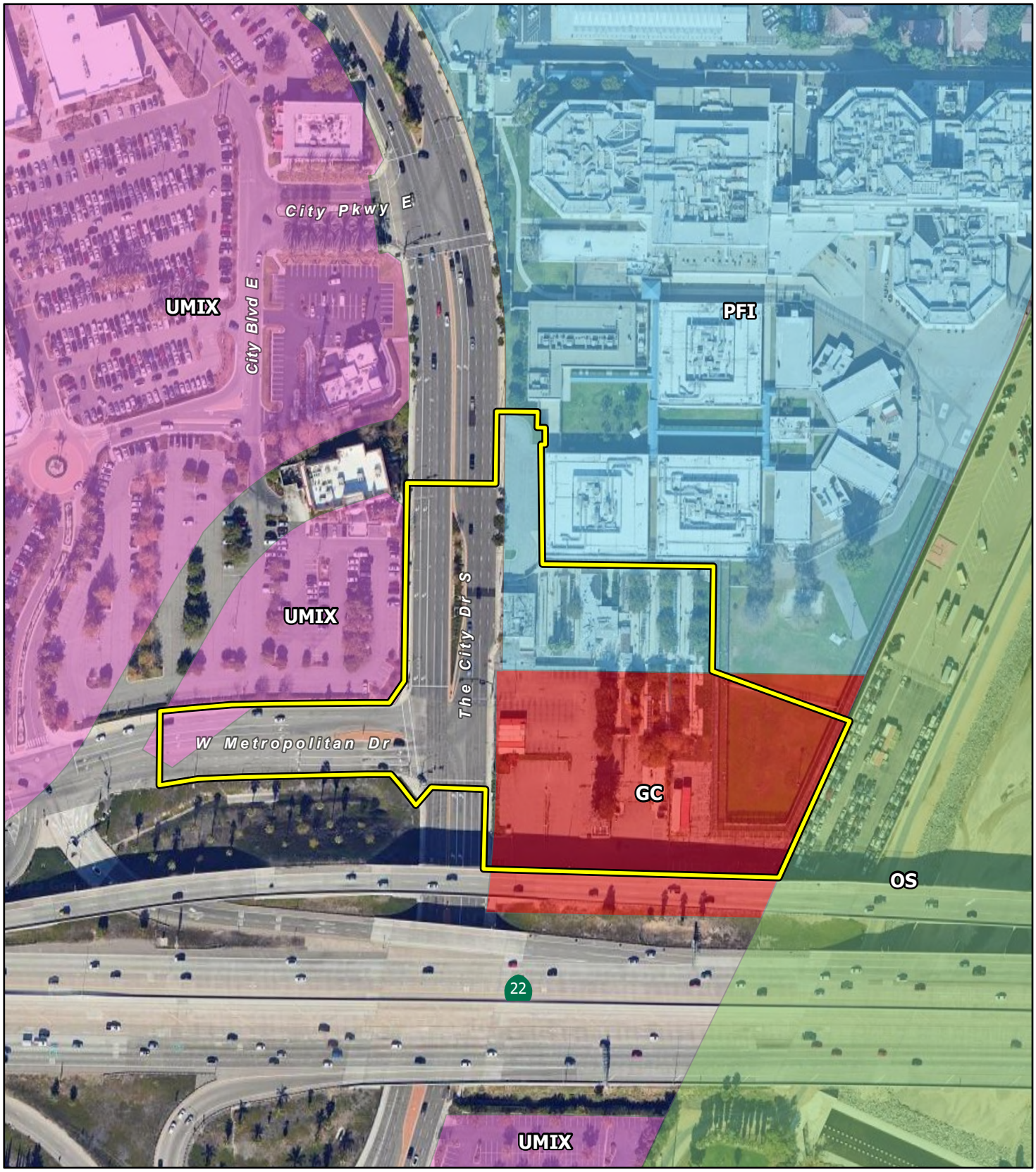
Direction	Existing Land Use	General Plan Land Use Designation	Zoning District
Project Site	Vacant disturbed lot	Public Facilities and Institutions (PFI), and General Commercial (GC)	Public Institution (P-I), and Limited Business (C-1)
North	Developed – Theo Lacy Facility	Public Facilities and Institutions (PFI)	Public Institution (P-I)
East	Developed – Vehicle and Equipment Storage Lot; Santa Ana River Channel and Bikeway	Open Space	Recreation Open Space
South	Developed – Sliver of vacant State-owned parcel, California State Route 22	General Commercial (GC)	Limited Business (C-1)
West	Developed – The Outlets at Orange mall, commercial restaurants, and surface parking	Urban Mixed Use (UMIX)	Urban Mixed Use (UMU)

Sources: City of Orange General Plan Land Use Element (2010, Revised 2015a); City of Orange Zoning Map (2020).

[6] City of Orange. 2015a. City of Orange General Plan Land Use Element. Website: https://www.cityoforange.org/home/showpublisheddocument/208/637698172555630000 (accessed January 14, 2025).

[7] City of Orange. 2020a. City of Orange Zoning Map. Website: https://www.cityoforange.org/home/showpublisheddocument/40/637707607413300000 (accessed January 14, 2025).

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LSA

Project Site

City of Orange General Plan Land Use Designations

- General Commercial Max. 1.0 FAR (GC)
- Open Space (OS)
- Public Facilities Max. 0.5 FAR and Institutions Max. 2.0 FAR (PFI)
- Urban Mixed Use 30-60 DU/AC (UMIX)

FIGURE 3-2

N

0 100 200

FEET

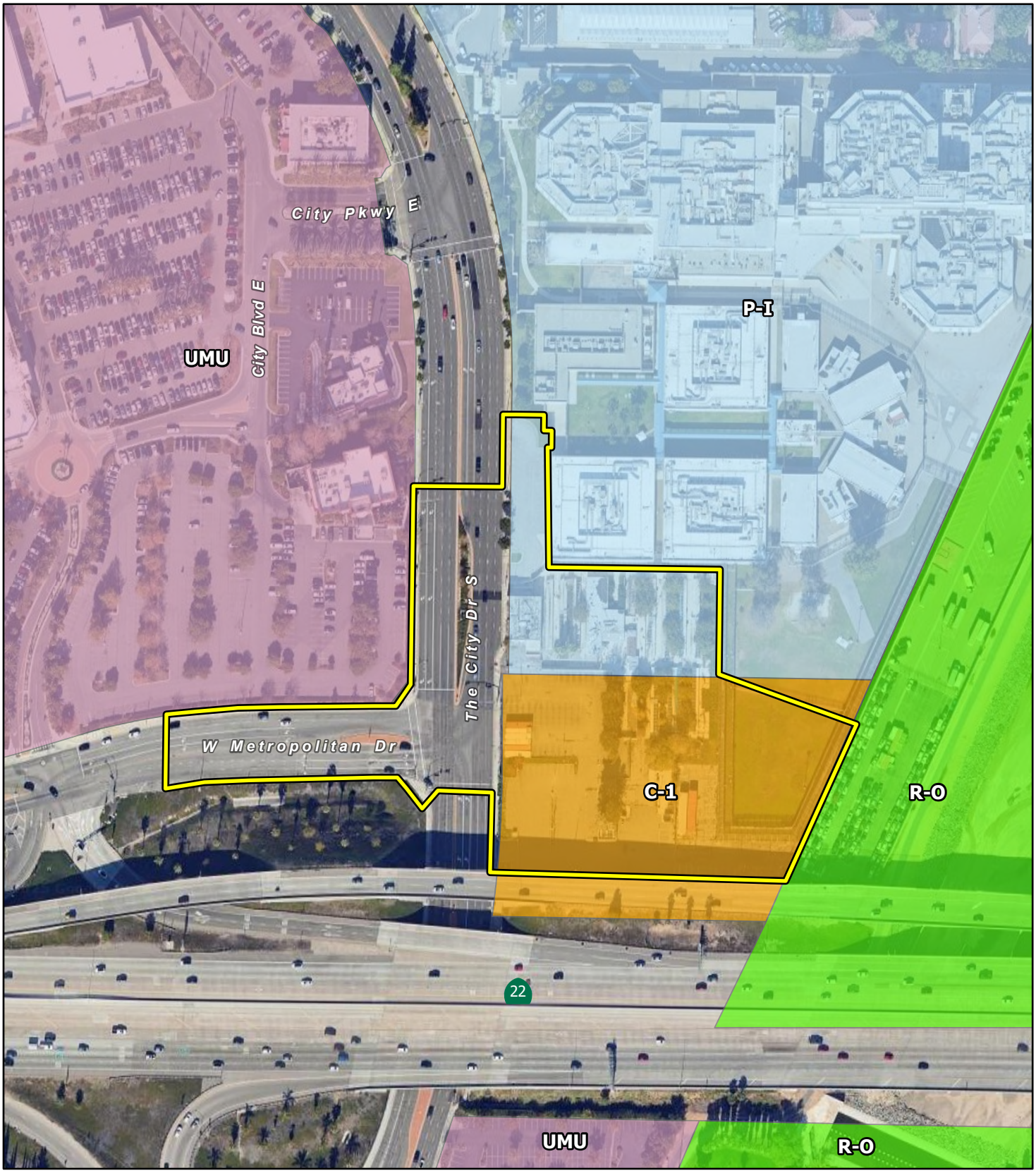
County of Orange Workforce Reentry Center Project

General Plan Land Uses

SOURCE: Google Maps (2024), City of Orange (2022)

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LSA

Project Site

City of Orange Zoning

- Limited Business (C-1)
- Public Institution (P-1)
- Recreation Open Space (R-O)
- Urban Mixed Use (UMU)

FIGURE 3-3

N

0 100 200

FEET

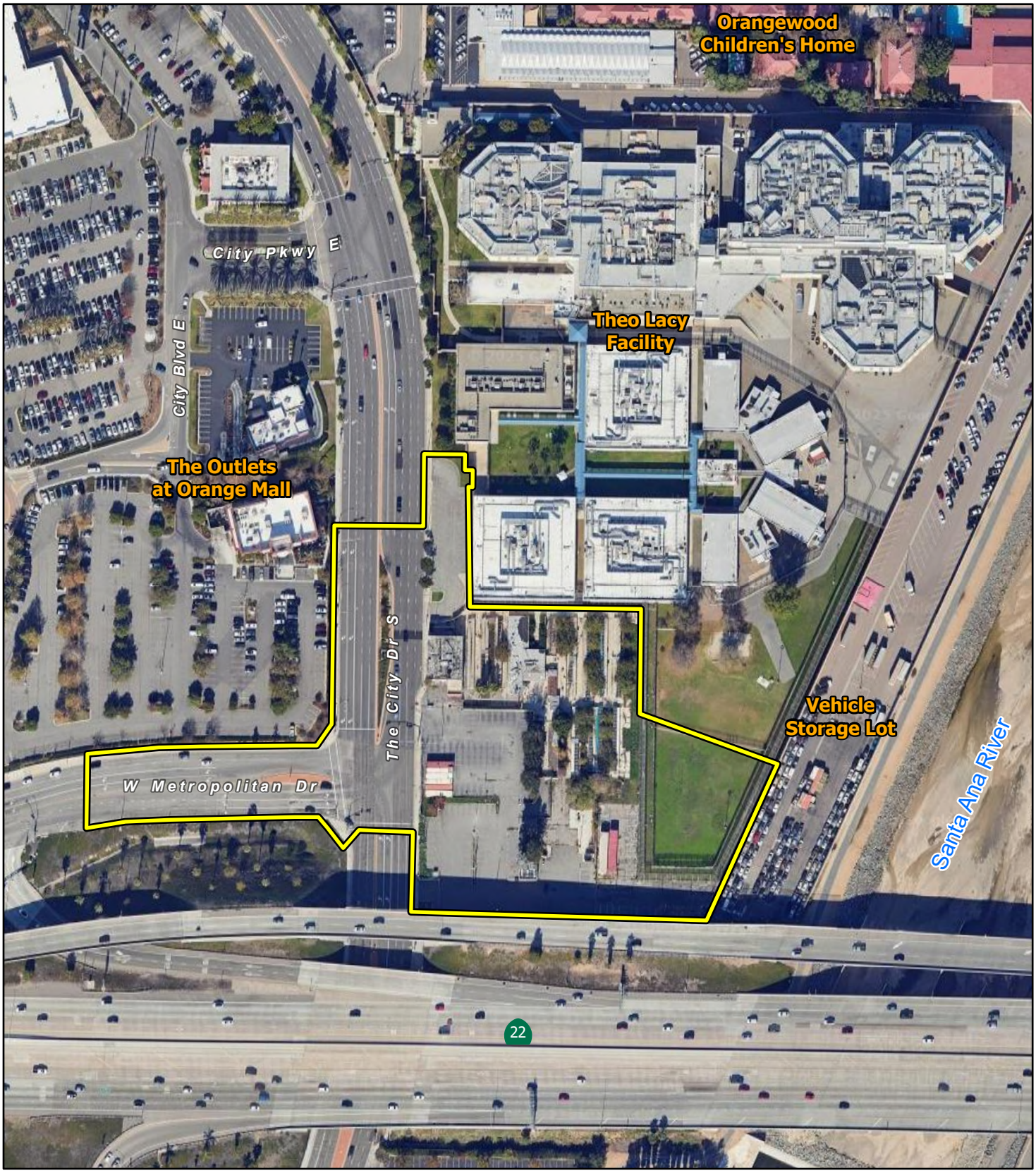
SOURCE: Google Maps (2024), City of Orange (2024)

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County of Orange Workforce Reentry Center Project

Zoning Designations

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LSA

Project Site

FIGURE 3-4

N

0 100 200
FEET

SOURCE: Google Maps (2024), City of Orange (2022)

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County of Orange Workforce Reentry Center Project

Existing Land Uses

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3.3 Proposed Project

The proposed project would develop the Workforce Reentry Center, which would consist of three new buildings along with associated hardscaping and outdoor areas. As previously stated, the three buildings would include (1) a two-story vocational/office building, (2) a one-story retail/culinary building, and (3) a two-story housing building for program participants. The Workforce Reentry Center is designed to provide transitional housing and vocational training for individuals involved in the criminal justice system or other County systems of care. These individuals would be trained to develop, produce, and provide goods and/or services to be delivered as part of the on-site business operation and for ultimate job placement within the community. Training/education programs that would be provided under the proposed project would include:

- Hospitality/Culinary
- Office Administration
- Marketing
- Information Technology
- Recruiting/Human Resources
- Animal Behavior
- Facilities/Maintenance
- Retail/Customer Service Representative
- Health/Wellness
- Gardening/Landscaping
- Entrepreneurship
- General Supplemental Skills

3.3.1 Background and Need

The proposed Workforce Reentry Center is designed to provide individuals involved in the criminal justice system or other County systems of care with vocational training, classes, and opportunities to practice skills necessary to re-enter society and reduce or avoid recidivism. The facility would include teaching skills focused on the retail and culinary industries, including producing goods that could be sold to support ongoing operations. This training program would allow program participants to practice valuable skills in public-facing retail facilities. The program would serve a target population of post-custody adults who are likely to succeed in a workforce reentry program on a voluntary basis. The County expects that many program participants would likely come from the Collaborative Courts, who are generally individuals on formal probation. However, the program would be available to any adult involved in the criminal justice system or other County systems of care and not limited to those on formal probation.

The proposed training programs would be provided through a collaboration between the County, the Hub for Integration, Reentry and Employment (H.I.R.E.), and/or Medlin Workforce & Reentry Solutions (MWRS). H.I.R.E is a non-profit organization that assists individuals in the County facing employment barriers due to past convictions and is the only organization in Orange County to provide services with no age or conviction restrictions. In 2024, H.I.R.E provided 1,318 people with employment, mentorship, and community building. Studies indicate that employment after release is the most important factor in reducing recidivism. Sixty percent of people with a history of incarceration are jobless and 60 to 65 percent of those released from incarceration are likely to reoffend within 3 years of their release date. MWRS is a private consulting firm that assists nonprofits, employers, and public agencies with developing programs in career readiness, job development, education, reentry programming, and community engagement.

The H.I.R.E mission would be supported by the Workforce Reentry Center expanding reentry support services in a central location to better serve individuals involved in the criminal justice system or other County systems of care. In addition to vocational training and classes proposed at the Workforce Reentry Center, on-site housing would provide short-term, transitional accommodations to support select program participants who may not have the ability to provide for themselves or who may face homelessness. The County's partnership with H.I.R.E and/or MWRS under this project would provide individuals returning from incarceration or involvement in the County's systems of care with the resources and support to succeed upon reentry and avoid recidivism.

3.3.1.1 Project Objectives

The County has established the following intended specific objectives to aid decision-makers in their review of the proposed project and its associated potential environmental impacts:

1. Establish an industry specific, post-custody, hands-on job training program(s) that provides successful program participants with a needed skillset, certification, resources and employment at the on-site commercial center or elsewhere.

2. Develop partnerships with community employers, providers, community colleges and/or trade schools to help provide industry specific expertise, oversight, mentorship, training, certification and employment opportunities.

3. Generate local interest and demand whereby the community or other consumers seek to purchase the goods or services provided by the Workforce Reentry Center.

4. Operate and maintain the onsite commercial business(es) to financially support the program.

5. Mitigate security risks by constructing a security block wall along the project site's border with the Theo Lacy Facility recreation yard.

6. Provide rent-free, on-site transitional housing with supportive services for program participants.

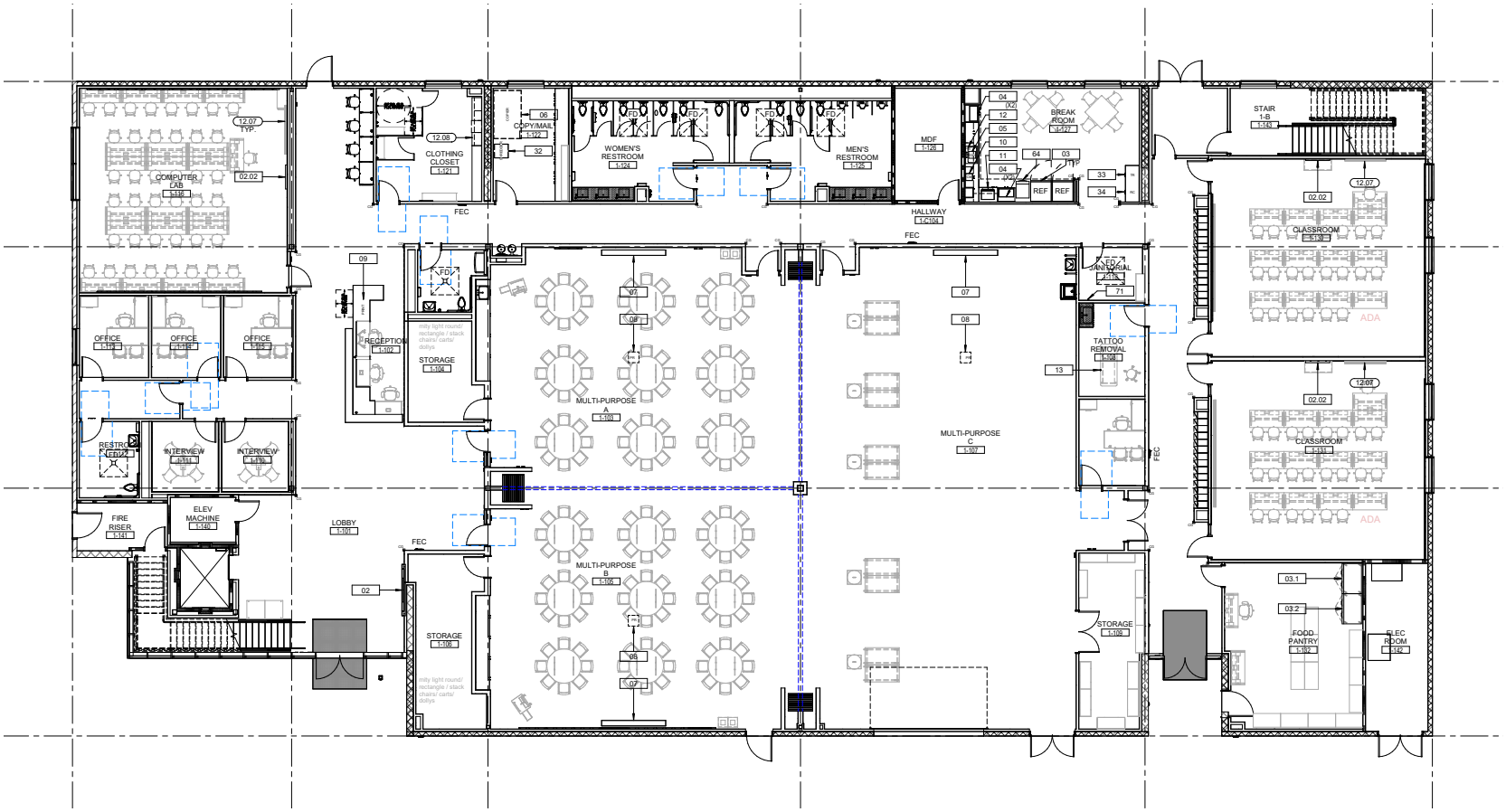
3.3.2 **Project Components**

3.3.2.1 Vocational/Office Building

The proposed vocational/office building would total approximately 37,200 sf and consist of two stories. The first floor would include four offices, two interview rooms, two classrooms, a training warehouse, a multi-purpose room, a computer lab, a tattoo removal room, and associated infrastructure. Additionally, this building would include a clothing closet for program participants to prepare for job interviews and to dress for office positions, retail positions, or other roles under the program. The second floor of the vocational/office building would include five conference rooms, 21 individual office spaces, two quiet rooms, and two counseling rooms. The majority of the second-floor space would also consist of open office areas with desks and cubicles or workstations for up to 75 individuals. Figure 3-5, Vocational/Office Building Floor Plans, provides more details regarding the uses proposed for this building.

3.3.2.2 Retail/Culinary Building

The proposed retail/culinary building would total 16,166 sf and would consist of one story that would include various kitchens for training and production as well as retail suites and open stalls for program participants to develop, produce, and provide goods and/or services to the public. Culinary components would include a bakery kitchen, a basic skills kitchen, a production kitchen, a chiller room, a freezer room,



LSA

FIGURE 3-5
Page 1 of 2

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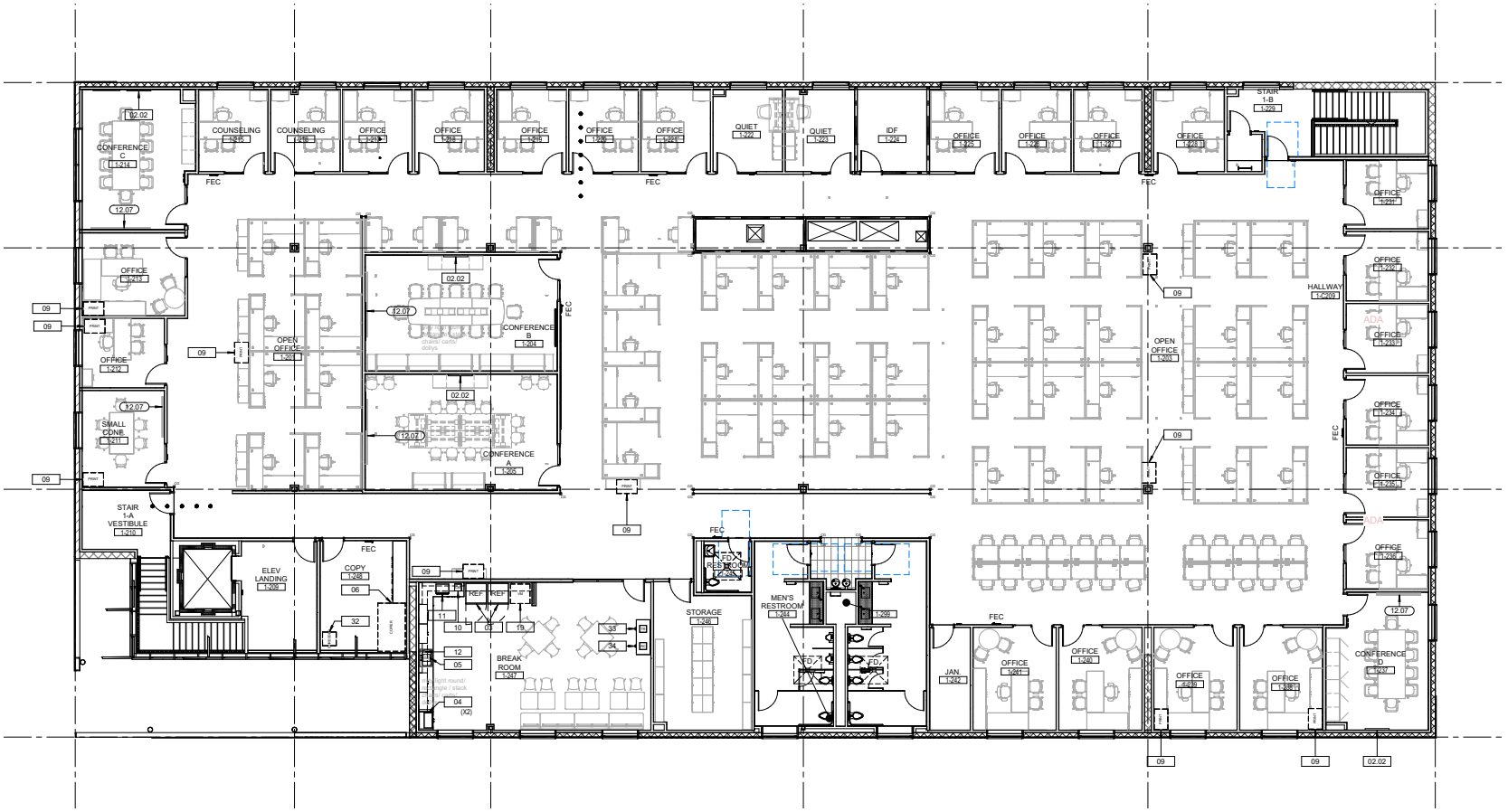
SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Vocational/Office Building Floor Plans - First Floor

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FIGURE 3-5
Page 2 of 2

NO SCALE

SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Vocational/Office Building Floor Plans- Second Floor

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a break room, and associated storage rooms. Additionally, the proposed project would provide two office areas for management-related and staff activities. The retail component of the building would consist of three retail suites intended for pet grooming, a fitness studio, and an open market with a grab-and-go bakery, bistro counter, and open retail stalls. The retail component would be open to the public and allow participants to develop retail service skills when providing goods and services. Figure 3-6, Retail/Culinary Building Floor Plans, provides further details regarding the uses proposed for this building.

3.3.2.3 Housing Building

The proposed housing building, providing short-term, transitional housing, would total 26,998 sf and would consist of two stories. The housing building would provide 54 beds dispersed among 34 total rooms, which would consist of single occupancy, double occupancy, and quadruple occupancy residential units. Two of the 54 beds would be provided in two on-site manager residential units, one proposed for each floor of the housing building. The first floor would include communal facilities such as a cafeteria, catering kitchen, a laundry room, a conference room, a common room, exam rooms, four offices, a gym, and restrooms and showers for program participants residing off site. Approximately nine residential units for program participants are proposed for the first story. The second floor would consist of 25 residential units. Each residential unit would have a toilet, sink, shower, and bedroom furniture. It is anticipated that most program participants would live and work on site, although some program participants may work off site. Similarly, some program participants may not live on site, but would participate in training, classes, and work shifts in the proposed retail stalls. Figure 3-7, Housing Building Floor Plans, provides more details regarding the uses proposed for this building.

3.3.2.4 Outdoor Areas

Outdoor activity and lounge areas are proposed between the housing building and retail/culinary building. These areas would be landscaped with grass turf, shade trees, and shrubs. Lounge tables, chairs, benches, and umbrellas are proposed for program participant use. Landscaping is further discussed in Section 3.3.4, Landscaping and Hardscaping. A grass turf pet relief enclosure is proposed for the east corner of the project site for program participants and another public pet relief/training enclosure is planned east of the retail/culinary building as part of the pet grooming service. An herb/vegetable garden is also planned east of the retail/culinary building to support the culinary and gardening/landscaping programs.

3.3.2.5 Staffing

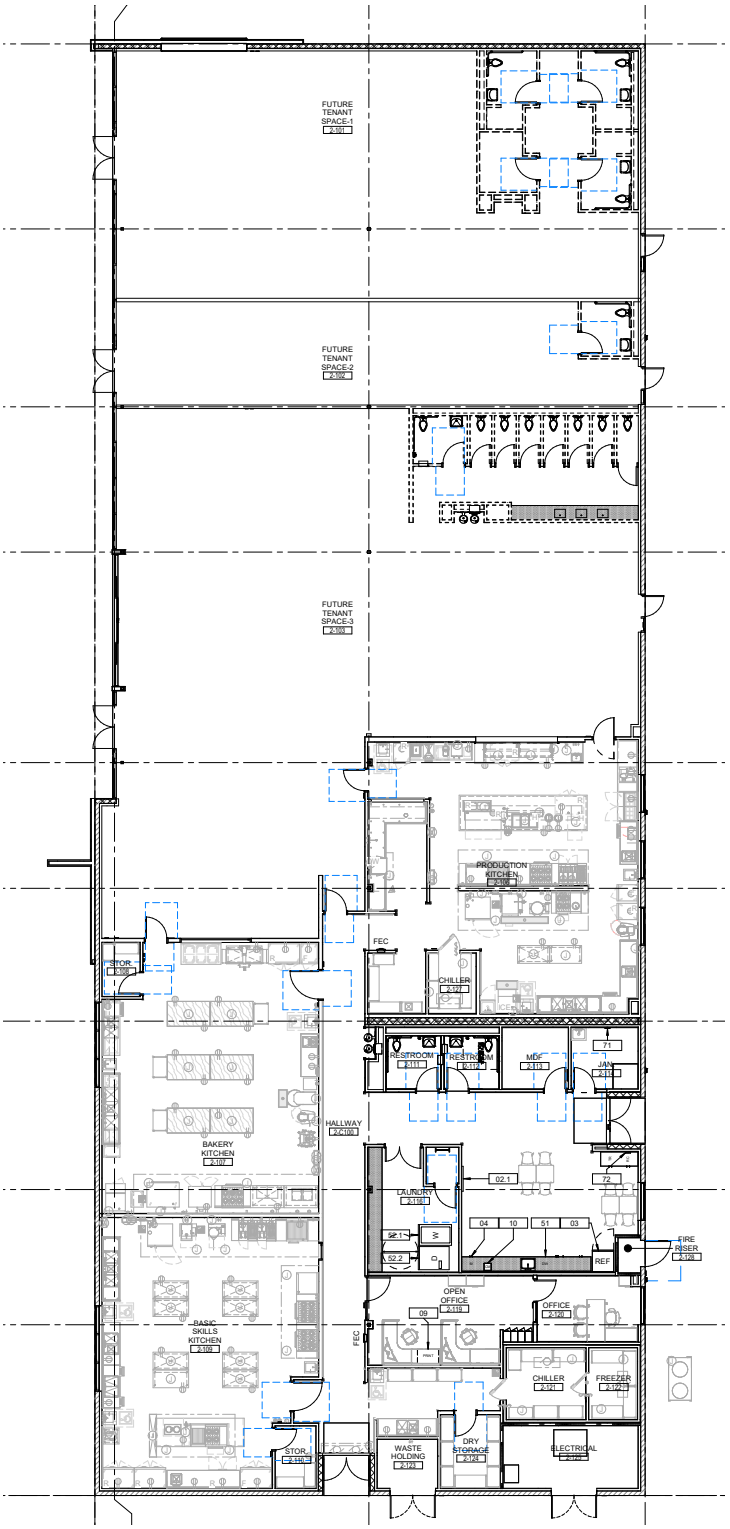
The proposed project would be staffed by trained professionals and would provide approximately 70 jobs, not including jobs created for program participants. Employment opportunities would include administrative staff, training program leaders/teachers, and cafeteria staff. Security personnel would also be present on the project site. Shift times would vary by position.

3.3.3 Site Layout and Design

3.3.3.1 Site Layout and Security

Figure 3-8, Overall Site Plan, depicts the proposed site layout. As described above, the project site is directly adjacent to the Theo Lacy Facility, which is separated by an existing security fence and partial wall. Under the proposed project, the existing fence and partial wall would be replaced by a new concrete masonry unit (CMU) wall to secure the project site. The project site includes a former recreational field associated with the Theo Lacy Facility and the proposed wall would also provide a screen from the Theo Lacy Facility. The perimeter of the project site would be landscaped with areas of shrubbery to soften its appearance.

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FIGURE 3-6

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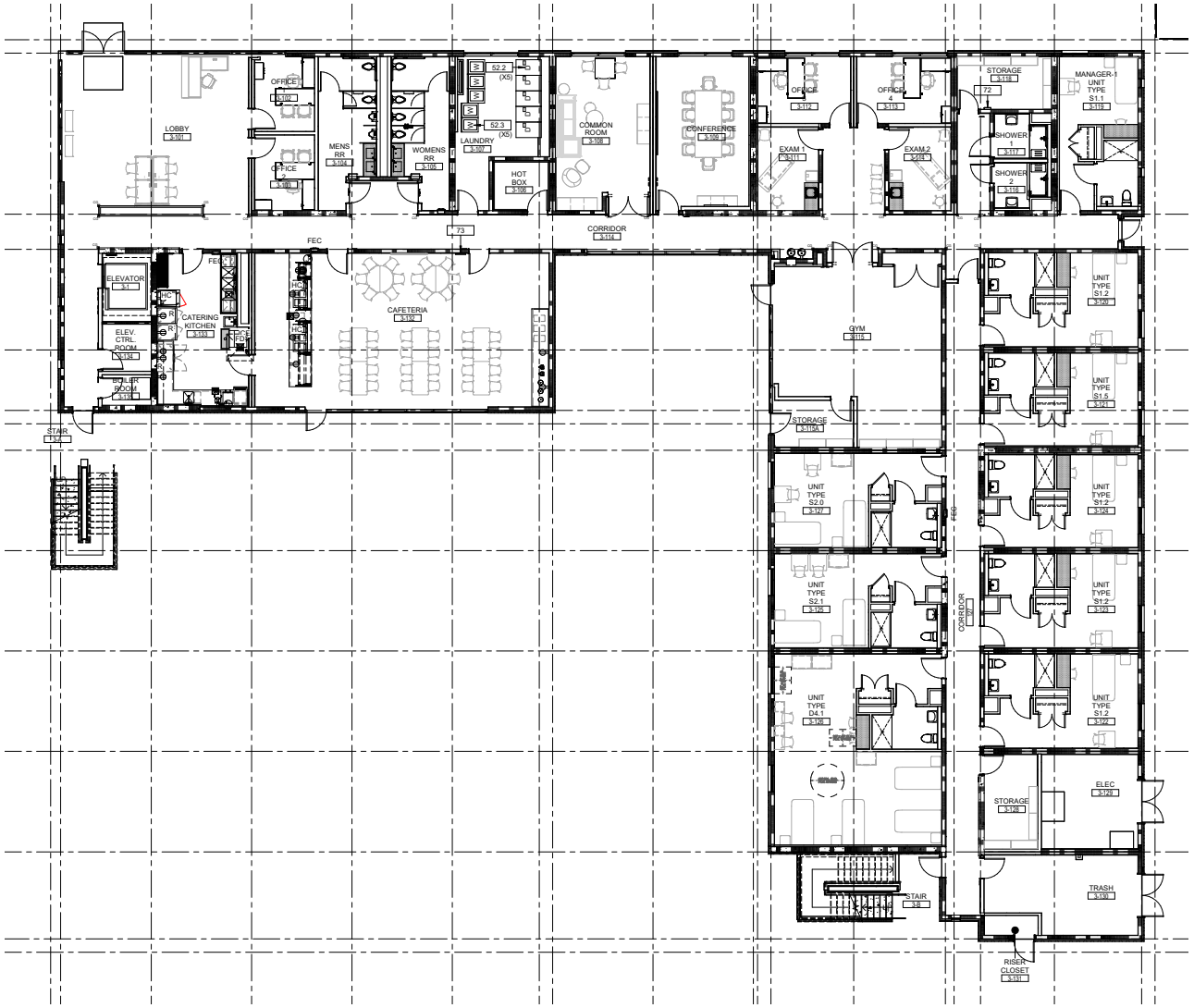
SOURCE: LPA

County of Orange Workforce Reentry Center Project

Retail/Culinary Building Floor Plans

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LSA

FIGURE 3-7
Page 1 of 2

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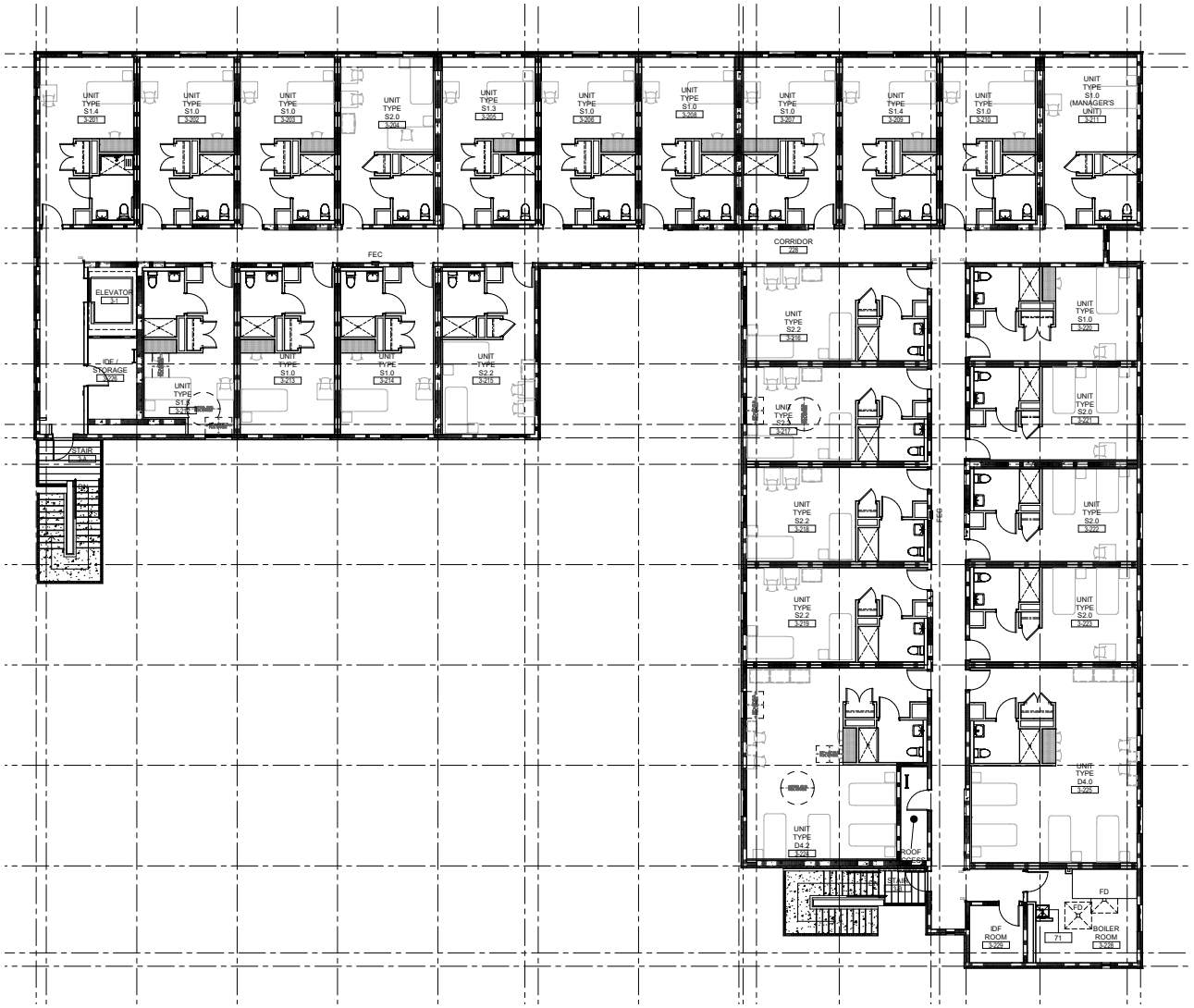
SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Housing Building Floor Plans - First Floor

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LSA

FIGURE 3-7
Page 2 of 2

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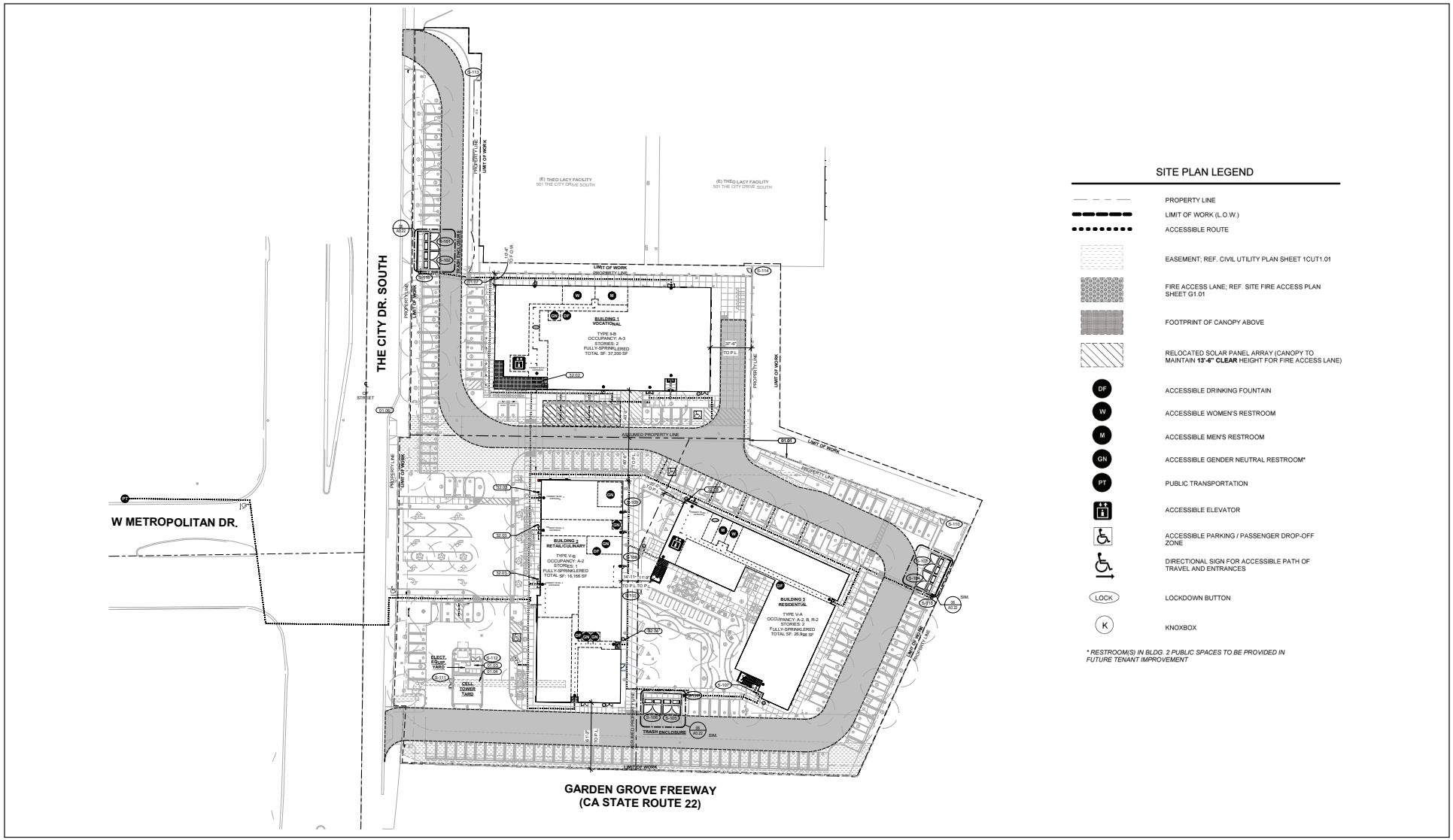
SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Housing Building Floor Plans - Second Floor

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FIGURE 3-8

NO SCALE

SOURCE: Griffin Swinerton, LPA

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County of Orange Workforce Reentry Center Project

Overall Site Plan

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Project site access would be provided via The City Drive South, with parking spaces available along the perimeter of the project site. On-site parking is discussed further in Section 3.3.5.2, below. The vocational/office building would be in the northern portion of the project site. The retail/culinary building would be south of the vocational/office building and situated next to the proposed housing building. A cell tower and electrical enclosure would be in the southwestern corner of the project site (refer to Section 3.3.6.1, below).

3.3.3.2 Signage

Wayfinding signage would be provided throughout the project site to orient program participants and visitors with the layout of the proposed facilities. A four-sided entry monument with digital signage on two or three sides would be provided at the main signalized entrance to the project site along The City Drive. Additionally, a secondary electronic directory sign near the northwest end of the retail/culinary building would provide directions, class schedules, and announcements.

3.3.3.3 Structural Design

The building materials used for the proposed project would include, but are not limited to, concrete, mortar joints, non-shrink grout, reinforcing bars, glazed windows, corrugated metal panels, steel framing, CMU, plaster, and cast-in place concrete framing. Structural materials and concrete properties would be designed to meet applicable requirements, including those set forth by the American Concrete Institution, American Society for Testing and Materials (ASTM) International, and California Building Code (CBC).

3.3.3.4 Sustainable Features

The proposed project would be designed in compliance with Title 24 of the California Code of Regulations (California Building Standards Code or Title 24), including California Green Building Standards Code (CALGreen) requirements for residential and non-residential buildings, to the extent feasible, including the incorporation of sustainable features into the project design. Specifically, the project would include the following sustainable features:

- EV charging stations and EV capable parking stalls (refer to Section 3.3.5, below)
- Bicycle parking and employee transportation alternatives
- Water conserving plumbing fixtures and fittings
- Landscaping irrigation equipment fitted with automatic controllers and sensors
- Specification of finish material pollutant control meeting volatile organic compound and formaldehyde limits (i.e., adhesives, sealants, caulks, paints and coatings, aerosol paints and coatings)
- Efficient variable refrigerant flow heating and air-conditioning system design
- Light pollution reduction
- Exterior material selection for sustainability and recycled content
- Low power consumption for lighting design and dimming systems
- Commissioning and testing of heating, ventilation, and air conditioning and lighting systems
- Insulation and sealing of exterior building envelopes
- Roof-mounted solar photovoltaic panels on the vocational/office building (108 kilowatts [kW]) and the supportive housing building (80 kW), as well as a solar photovoltaic canopy south of the

vocational/office building (24 kW), as well as one battery energy storage system with a storage capacity of up to 245 kW hours.

3.3.4 Landscaping and Hardscaping

The proposed landscaping and hardscaping improvements for the proposed project would blend with the architecture of the proposed buildings. The proposed landscaping is intended to soften the visual appearance of the center and to promote a safe environment. The parking areas within the eastern and western portions of the project site would be lined with canopy trees. Figure 3-9, Landscaping Plan, details the planting plan within the project site. The outdoor area between the housing building and retail/culinary building would consist of grass turf, shade trees, and flowering trees. Figure 3-10, Planting Palette, lists the specific plant species that would be included as part of the landscaping of the project site. All species would be native and drought-tolerant and would have minimal irrigation requirements.

Proposed hardscaping improvements include additions at the entry driveways, including a planting area, three flagpoles, and curb and gutter. Paths of travel throughout the project site would be paved with concrete paving in a natural grey color with a top cast finish or medium broom finish, and truncated dome pavers. Other hardscaping additions include site furnishing such as bicycle racks, bicycle lockers, and outdoor lounge furniture including umbrellas, sofas, lounge chairs, benches, and lounge tables.

3.3.5 Vehicle Access, Site Circulation, and Parking

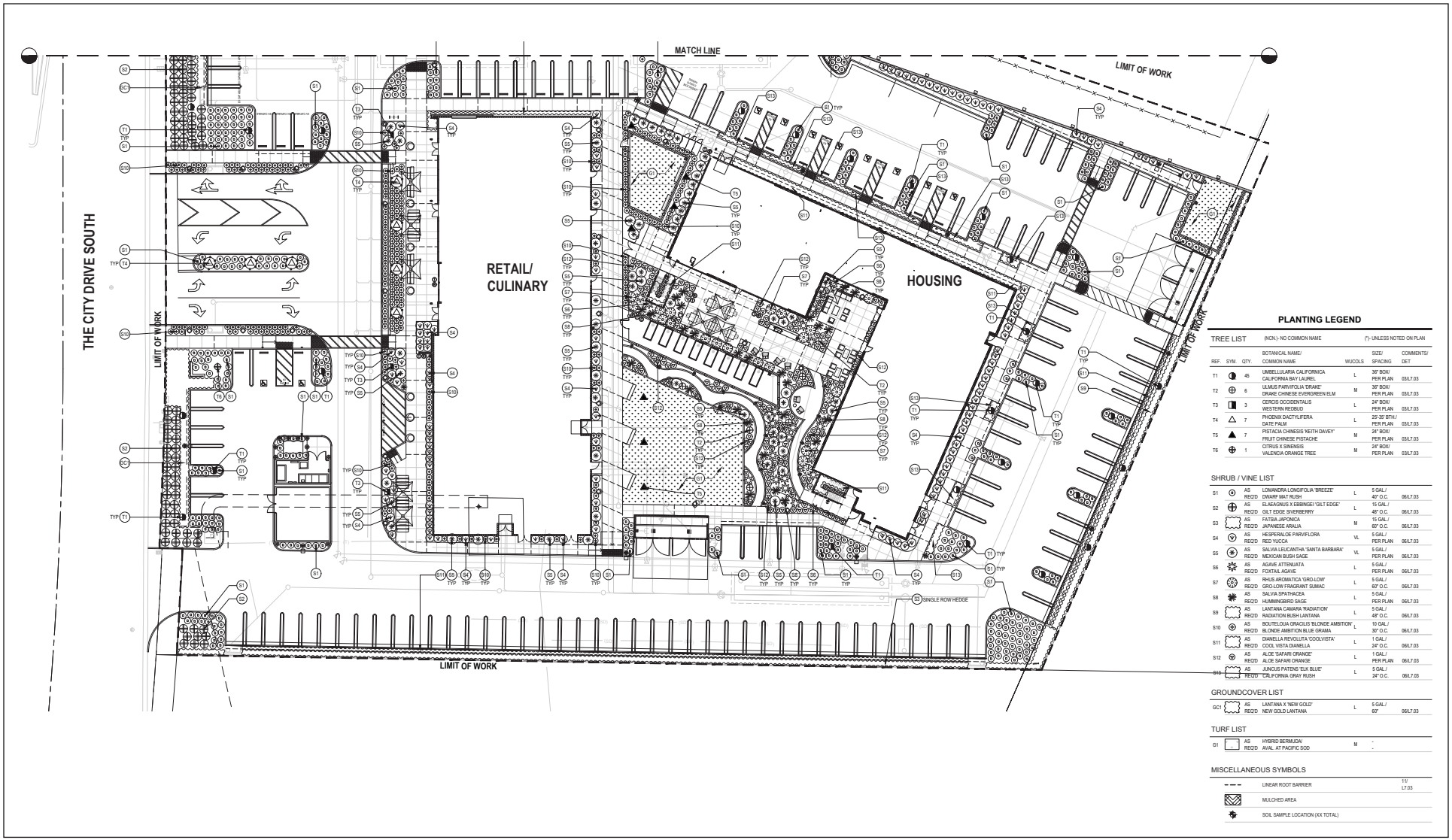
3.3.5.1 Access and Circulation

There are four existing driveways along The City Drive South providing access to the project site; however, fencing currently restricts access to each. Two driveways are at the northwestern edge of the project site, one center driveway is near the signalized intersection of The City Drive South with West Metropolitan Drive, and another driveway is at the southwestern corner of the project site, adjacent to SR-22.

Under the proposed project, access to the project site would be provided via three driveways along The City Drive South; one signalized driveway and two right-turn only driveways. The northern driveway would connect to a proposed internal circulation roadway to establish connectivity between the northern parking lot and the remainder of the project site.

The northernmost existing driveway would remain intact under the proposed project. The center driveway to the west would be widened and integrated into the existing traffic signal at The City Drive South and West Metropolitan Drive. Finally, the existing driveway adjacent to SR-22 would also continue to provide access to the project site but would remain a right-turn only driveway.

The proposed project would include an internal circulation roadway connecting each driveway with proposed surface parking and Workforce Reentry Center buildings. Specifically, from the northernmost driveway, the internal circulation roadway would run south of the vocational/office building, loop around the eastern edge of the residential building, and then run to the south of the residential and retail/culinary buildings and along the western side of the retail/culinary building until it connects to the signalized driveway.



PLANTING LEGEND

TREE LIST (NCN.)- NO COMMON NAME (*)- UNLESS NOTED ON PLAN

REF.	SYM.	QTY.	BOTANICAL NAME/ COMMON NAME	WUCOLS	SIZE/ SPACING	COMMENTS/ DET
T1		45	UMBELLULARIA CALIFORNICA CALIFORNIA BAY LAUREL	L	36" BOX/ PER PLAN	03/L7.03
T2		6	ULMUS PARVIFOLIA 'DRAKE' DRAKE CHINESE EVERGREEN ELM	M	36" BOX/ PER PLAN	03/L7.03
T3		3	CERCIS OCCIDENTALIS WESTERN REDBUD	L	24" BOX/ PER PLAN	03/L7.03
T4		7	PHOENIX DACTYLIFERA DATE PALM	L	20'-30' BTH./ PER PLAN	03/L7.03
T5		7	PISTACIA CHINESIS 'KEITH DAVEY' FRUIT CHINESE PISTACHE	M	24" BOX/ PER PLAN	03/L7.03
T6		1	CITRUS X SINENSIS VALENCIA ORANGE TREE	M	24" BOX/ PER PLAN	03/L7.03

SHRUB / VINE LIST

S1		AS REQ'D	LOMANDRA LONGIFOLIA 'BREEZE' DWARF MAT RUSH	L	5 GAL./ 40" O.C.	06/L7.03
S2		AS REQ'D	ELAEAGNUS X EBBINGEI 'GILT EDGE' GILT EDGE SIVERBERRY	L	15 GAL./ 48" O.C.	06/L7.03
S3		AS REQ'D	FATSIA JAPONICA JAPANESE ARALIA	M	15 GAL./ 60" O.C.	06/L7.03
S4		AS REQ'D	HESPERALOE PARVIFLORA RED YUCCA	VL	5 GAL./ PER PLAN	06/L7.03
S5		AS REQ'D	SALVIA LEUCANTHA 'SANTA BARBARA' MEXICAN BUSH SAGE	VL	5 GAL./ PER PLAN	06/L7.03
S6		AS REQ'D	AGAVE ATTENUATA FOXTAIL AGAVE	L	5 GAL./ PER PLAN	06/L7.03
S7		AS REQ'D	RHUS AROMATICA 'GRO-LOW' GRO-LOW FRAGRANT SUMAC	L	5 GAL./ 60" O.C.	06/L7.03
S8		AS REQ'D	SALVIA SPATHACEA HUMMINGBIRD SAGE	L	5 GAL./ PER PLAN	06/L7.03
S9		AS REQ'D	LANTANA CAMARA 'RADIATION' RADIATION BUSH LANTANA	L	5 GAL./ 48" O.C.	06/L7.03
S10		AS REQ'D	BOUTELOUA GRACILIS 'BLONDE AMBITION' BLONDE AMBITION BLUE GRAMA	L	10 GAL./ 30" O.C.	06/L7.03
S11		AS REQ'D	DIANELLA REVOLUTA 'COOLVISTA' COOL VISTA DIANELLA	L	1 GAL./ 24" O.C.	06/L7.03
S12		AS REQ'D	ALOE 'SAFARI ORANGE' ALOE SAFARI ORANGE	L	1 GAL./ PER PLAN	06/L7.03
S13		AS REQ'D	JUNCUS PATENS 'ELK BLUE' CALIFORNIA GRAY RUSH	L	5 GAL./ 24" O.C.	06/L7.03

GROUNDCOVER LIST

GC1		AS REQ'D	LANTANA X 'NEW GOLD' NEW GOLD LANTANA	L	5 GAL./ 60"	06/L7.03

TURF LIST

GT		AS REQ'D	HYBRID BERMUDA/ AVAL. AT PACIFIC SOD	M	- -	

MISCELLANEOUS SYMBOLS

	LINEAR ROOT BARRIER	11/ L7.03
	MULCHED AREA	
	SOIL SAMPLE LOCATION (XX TOTAL)	

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FIGURE 3-9

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NO SCALE

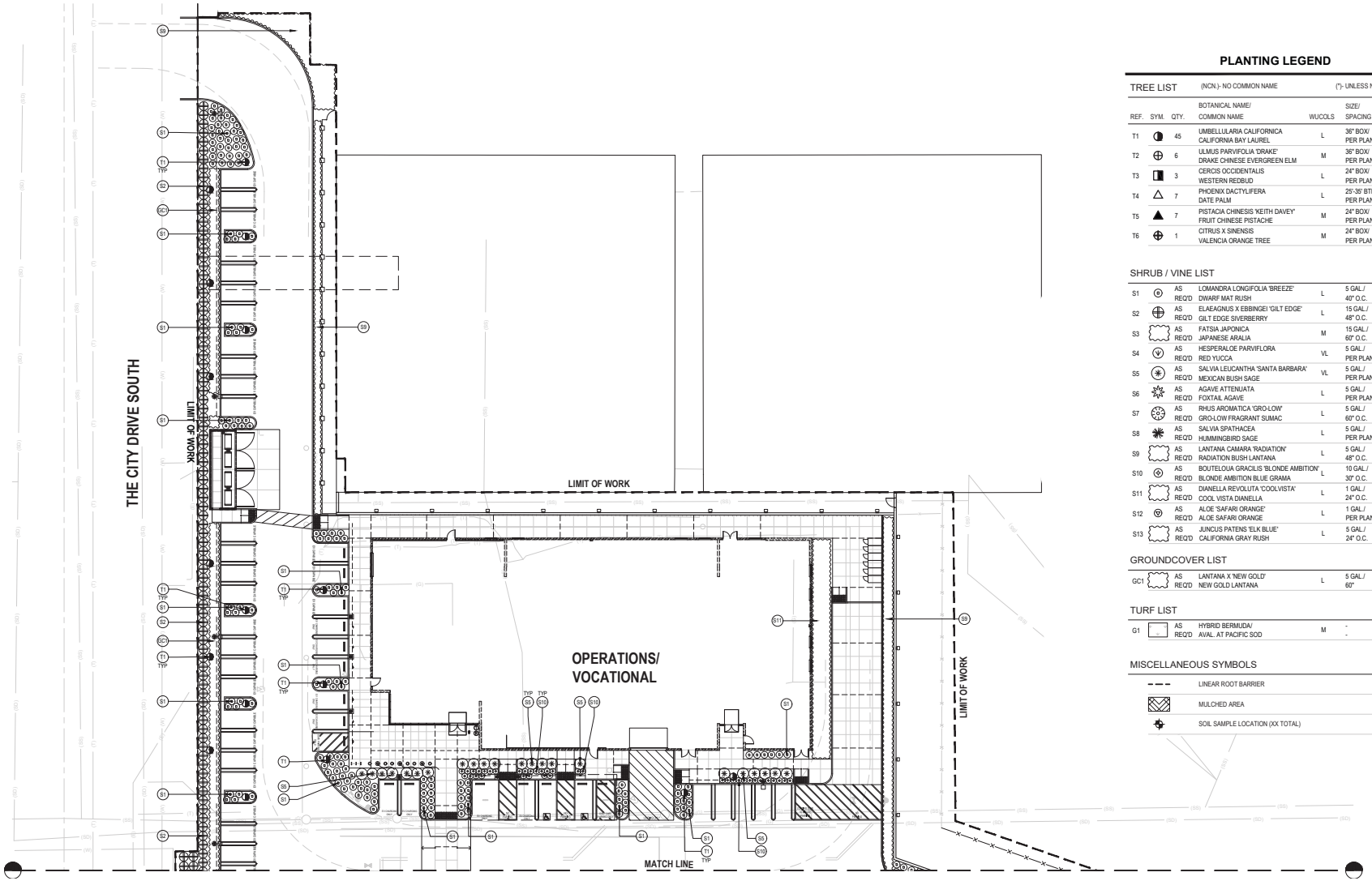
SOURCE: LPA, Griffin Swinerton

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County of Orange Workforce Reentry Center Project

Landscaping Plan

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PLANTING LEGEND

TREE LIST

(NCN.)- NO COMMON NAME (*)- UNLESS NOTED ON PLAN

REF.	SYM.	QTY.	BOTANICAL NAME/ COMMON NAME	WUCOLS	SIZE/ SPACING	COMMENTS/ DET
T1		45	UMBELLULARIA CALIFORNICA CALIFORNIA BAY LAUREL	L	36" BOX/ PER PLAN	03/L7.03
T2		6	ULMUS PARVIFOLIA 'DRAKE' DRAKE CHINESE EVERGREEN ELM	M	36" BOX/ PER PLAN	03/L7.03
T3		3	CERCIS OCCIDENTALIS WESTERN REDBUD	L	24" BOX/ PER PLAN	03/L7.03
T4		7	PHOENIX DACTYLIFERA DATE PALM	L	25'-35' BTH./ PER PLAN	03/L7.03
T5		7	PISTACIA CHINESIS 'KEITH DAVEY' FRUIT CHINESE PISTACHE	M	24" BOX/ PER PLAN	03/L7.03
T6		1	CITRUS X SINENSIS VALENCIA ORANGE TREE	M	24" BOX/ PER PLAN	03/L7.03

SHRUB / VINE LIST

S1		AS REQ'D	LOMANDRA LONGIFOLIA 'BREEZE' DWARF MAT RUSH	L	5 GAL./ 40" O.C.	06/L7.03
S2		AS REQ'D	ELAEAGNUS X EBBINGEI 'GILT EDGE' GILT EDGE SIVERBERRY	L	15 GAL./ 48" O.C.	06/L7.03
S3		AS REQ'D	FATSIA JAPONICA JAPANESE ARALIA	M	15 GAL./ 60" O.C.	06/L7.03
S4		AS REQ'D	HESPERALOE PARVIFLORA RED YUCCA	VL	5 GAL./ PER PLAN	06/L7.03
S5		AS REQ'D	SALVIA LEUCANTHA 'SANTA BARBARA' MEXICAN BUSH SAGE	VL	5 GAL./ PER PLAN	06/L7.03
S6		AS REQ'D	AGAVE ATTENUATA FOXTAIL AGAVE	L	5 GAL./ PER PLAN	06/L7.03
S7		AS REQ'D	RHUS AROMATICA 'GRO-LOW' GRO-LOW FRAGRANT SUMAC	L	5 GAL./ 60" O.C.	06/L7.03
S8		AS REQ'D	SALVIA SPATHACEA HUMMINGBIRD SAGE	L	5 GAL./ PER PLAN	06/L7.03
S9		AS REQ'D	LANTANA CAMARA 'RADIATION' RADIATION BUSH LANTANA	L	5 GAL./ 48" O.C.	06/L7.03
S10		AS REQ'D	BOUTELOUA GRACILIS 'BLONDE AMBITION' BLONDE AMBITION BLUE GRAMA	L	10 GAL./ 30" O.C.	06/L7.03
S11		AS REQ'D	DIANELLA REVOLUTA 'COOLVISTA' COOL VISTA DIANELLA	L	1 GAL./ 24" O.C.	06/L7.03
S12		AS REQ'D	ALOE 'SAFARI ORANGE' ALOE SAFARI ORANGE	L	1 GAL./ PER PLAN	06/L7.03
S13		AS REQ'D	JUNCUS PATENS 'ELK BLUE' CALIFORNIA GRAY RUSH	L	5 GAL./ 24" O.C.	06/L7.03

GROUNDCOVER LIST

GC1		AS REQ'D	LANTANA X 'NEW GOLD' NEW GOLD LANTANA	L	5 GAL./ 60"	06/L7.03

TURF LIST

G1		AS REQ'D	HYBRID BERMUDA/ AVAL. AT PACIFIC SOD	M	- -	

MISCELLANEOUS SYMBOLS

	LINEAR ROOT BARRIER	11/ L7.03
	MULCHED AREA	
	SOIL SAMPLE LOCATION (XX TOTAL)	

LSA

FIGURE 3-9
Page 2 of 2

N

NO SCALE

SOURCE: LPA, Griffin Swinerton

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County of Orange Workforce Reentry Center Project

Landscaping Plan

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TREES


GEIJERA PARVIFLORA
AUSTRALIAN WILLOW


UMBELLULARIA CALIFORNICA
CALIFORNIA LAUREL


ULMUS PARVIFOLIA
CHINESE ELM


SEARSIA LANCEA
ARCHAICALLY KARREE


PISTACIA CHINENSIS
CHINESE PISTACH


PISTACIA CHINENSIS
CHINESE PISTACH (FALL COLOR)


LAGERSTROEMIA INDICA 'MUSKOGEE'
MUSKOGEE CRAPE MYRTLE


CERCIS OCCIDENTALIS
WESTERN REDBUD TREE

SHRUBS


RHUS AROMATICA 'GRO-LOW'
AROMATIC SUMAC


MYOPORUM PARVIFOLIUM
CREEPING BOOBIALLA


OLEA EUROPAEA 'MONTRA'
LITTLE OLLIE


LIGUSTRUM JAPONICUM 'TEXANUM'
WAXLEAF PRIVET


ELAEAGNUS × EBBINGEI 'GILT EDGE'
GILD EDGE SILVERBERRY


LANTANA CAMARA 'RADIATION'
RADIATION BUSH LANTANA


LANTANA MONTEVIDENSIS 'ALBA'
WHITE TRAILING LANTANA


ZAUSCHNERIA CALIFORNICA 'BOWMAN'
HUMMINGBIRD TRUMPET


HESPERALOE PARVIFLORA
REDFLOWER FALSE YUCCA


HESPERALOE PARVIFLORA 'YELLOW'
YELLOW YUCCA


ALOE X 'SAFARI ORANGE'
SAFARI ORANGE ALOE


SALVIA GREGGII 'FURMAN'S RED'
TEXAS SAGE


SALVIA SPATHACEA
HUMMINGBIRD SAGE


BUDDLEJA DAVIDII
SUMMER LILAC


AGASTACHE POQUITO 'ORANGE'
DWARF HUMMINGBIRD MINT













LSA

FIGURE 3-10

NO SCALE

SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Painting Palette

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3.3.5.2 Parking

Surface parking spaces would be provided along the western, southern, and eastern project site periphery as well as around several of the proposed buildings. In addition to three drop-off/loading areas, one United States Postal Service stall and one golf cart parking stall, a total of 171 public and employee parking stalls are proposed, as shown in Table 3.B.

Table 3.B: On-Site Parking Stall Breakdown

Parking Stall Type	Number of Spaces/Stalls
Standard Accessible EV Charging Station (EVCS)	1
Van Accessible EVCS	1
Standard EV Capable Stalls (EVC)[1]	35
Standard EVCS	7
Standard Accessible Stalls	10
Van Accessible Stalls	2
Standard Stalls	115
Total	**171**

Source: County of Orange (2025).

[1] These stalls would be used as standard parking stalls for the initial period immediately following development of the proposed project.

The proposed project would achieve Americans with Disabilities Act compliance through the inclusion of 10 standard accessible stalls and two van-accessible stalls. In addition, proposed parking would also include one United States Postal Service stall and one golf cart parking/charging station stall.

The proposed surface parking would also meet 2022 CALGreen requirements for electric vehicle charging station (EVCS) and electric vehicle capable parking spots and would serve both employee and public vehicles. Specifically, 35 electric-vehicle capable stalls and seven EVCS stalls are proposed, which meets CALGreen requirements. In addition, one accessible EVCS and one accessible van EVCS are proposed. Per CALGreen requirements, 12 short-term bicycle parking stalls and 9 long-term bicycle storage lockers are proposed on site.

3.3.5.3 Off-Site Improvements

To accommodate project-associated vehicular traffic while minimizing delays on surrounding roadways, the proposed project would include several roadway improvements to The City Drive South and West Metropolitan Drive just outside of the approximately 4.6-acre project site proposed for development of the Workforce Reentry Center. As stated in Section 3.3.5.1, Access and Circulation, the existing project site driveway at the intersection of The City Drive South and West Metropolitan Drive would be modified from a right-turn only driveway and would become a part of the signalized intersection. As such, the existing traffic signal at the intersection of The City Drive South and West Metropolitan Drive would be reconfigured to allow southbound vehicles to turn left from The City Drive South and eastbound vehicles to travel straight from West Metropolitan Drive. Additionally, vehicles departing the project site would be able to turn left or right onto The City Drive South, or travel straight onto westbound West Metropolitan Drive.

The proposed project would modify the existing landscaped median along The City Drive South to accommodate a new, dedicated left-turn lane for southbound vehicles to access the project site. As part of this modification, the median width would be substantially reduced, and an existing City monument sign in the median would be slightly shifted.

Improvements along West Metropolitan Drive would also include modifications to the existing brick median to accommodate an additional left-turn pocket. Other restriping would be required to convert a former left-turn lane into a through lane.

Construction of these improvements would take place concurrently with development of the project site and are part of the proposed project. Figure 3-11, Off-Site Roadway Improvements, depicts plans related to these off-site modifications.

3.3.6 **Utilities**

The proposed project would include new wet utility laterals (i.e., sewer, water, storm drain and fire water) to the project site to support the proposed new buildings, as needed. In addition, new electrical improvements would be provided for the proposed new buildings.

3.3.6.1 Sewer

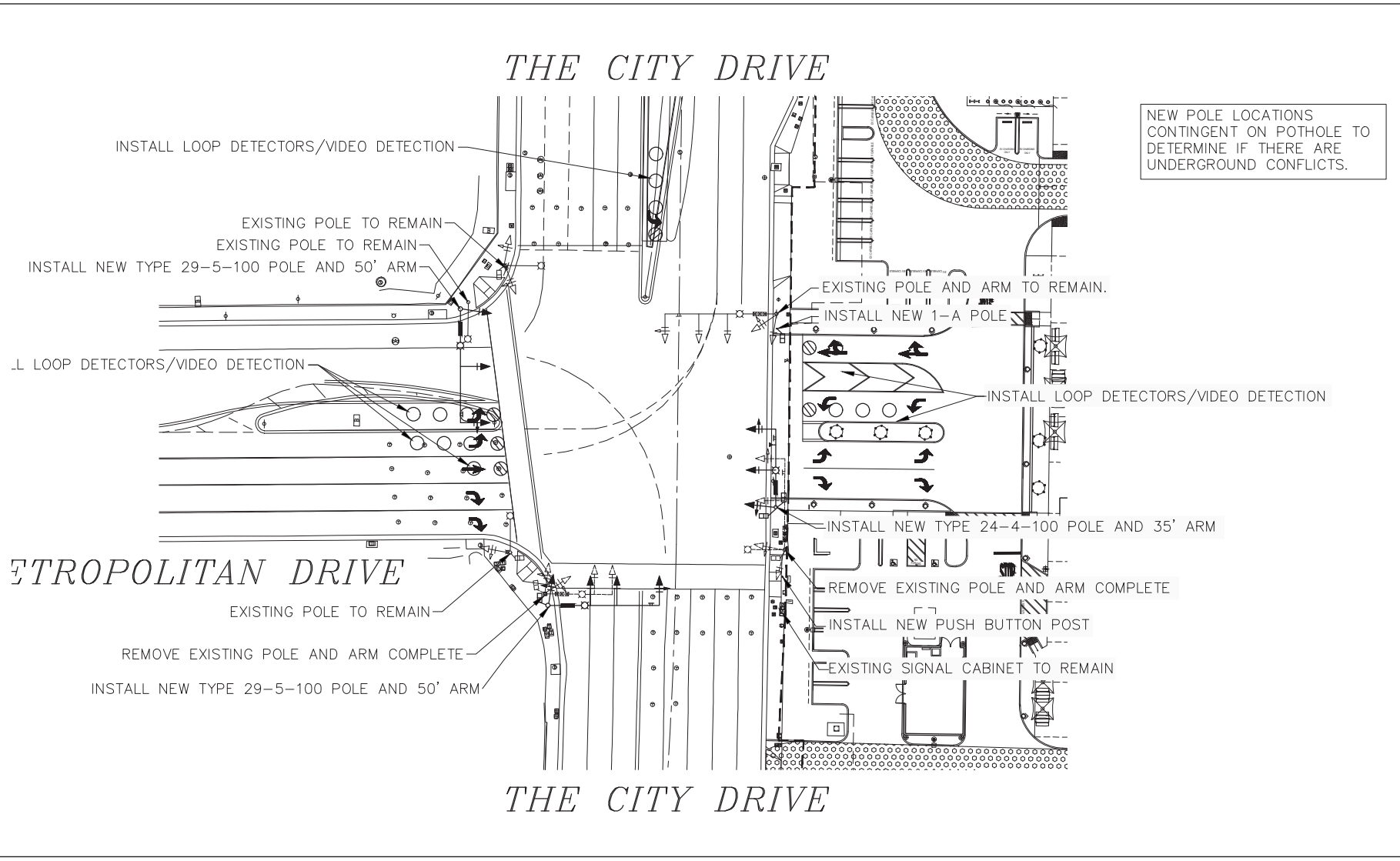
Existing sewer mains adjacent to the project site include a 10-inch mainline along The City Drive South, a 72-inch mainline along the eastern boundary of the site, and a 30-inch mainline that runs east to west south of the proposed vocational/office building. The proposed project would include one or more new 4-inch and 6-inch sewer laterals to be extended as needed from the existing mainline sewer system.

3.3.6.2 Storm Drainage and Stormwater

A 45-inch storm drainpipe runs in an east-west orientation beneath the middle of the project site from a gutter along the eastern side of The City Drive South, ultimately discharging into the Santa Ana River. An existing 66-inch storm-drain pipe extends from The City Drive South, in an east-west orientation beneath the southern border of the project site, and also ultimately drains to the Santa Ana River. The proposed project would include new 12-inch and 15-inch storm drainage laterals to be extended as needed from the two existing storm-drain pipes beneath the site. It is anticipated that the proposed project would capture 98 percent of runoff through proposed drain inlets and catch basins within the project site. The remaining 2 percent of runoff would drain as surface flow onto The City Drive South, ultimately entering the east gutter of The City Drive South and flowing through the 45-inch storm drain-pipe before discharging to the Santa Ana River, as it does under existing conditions.

All stormwater impacts associated with the proposed project, including post-construction urban runoff and stormwater pollution, would be addressed according to the *Orange County Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs)*.[8] A site-specific Preliminary WQMP has been prepared for the proposed project and outlines Stormwater Best Management Practices that comply with this document, ensure conservation, and mimic natural hydrologic patterns.

[8] County of Orange. 2013. Technical Guidance Document (TGD) for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans. December 20. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/2021-06/OC_TGD%2812-20-2013%29.pdf (accessed January 14, 2025).



LSA

FIGURE 3-11

NO SCALE

SOURCE: LPA

I:\O\OCY2001.51\G\Roadway_Improvements.ai (2/25/2025)

County of Orange Workforce Reentry Center Project

Off-Site Roadway Improvements

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3.3.6.3 Electrical

The design, manufacture, testing, and method of installation of all electrical apparatus and materials under the proposed project would conform with the latest applicable codes and standards. The proposed project would include new pull boxes and conduits, which would follow applicable codes, standards, and criteria. A new electrical enclosure is proposed adjacent to the relocated cell tower discussed above. The electrical enclosure would include a main switchboard, a battery energy storage system, a transformer, a panel board, conductor conduits, and disconnect switches.

The proposed project's interior, exterior, and emergency lighting designs would follow existing applicable standards. Where feasible, energy-efficient light-emitting diode (LED) bulbs would be used. Exterior lighting would adhere to on-site aesthetics and design standards and be designed to minimize light pollution and glare whilst ensuring the safety and security of the site. Exterior lighting fixtures would include roadway and parking poles, pedestrian poles, and wall mounted luminaires. Figure 3-12, Lighting Plan, provides a detailed depiction of proposed lighting fixture locations within the project site.

3.3.6.4 Gas

The proposed project would include the use of natural gas for the culinary kitchen training areas in the retail/culinary building and exterior BBQ area. The existing large-scale natural gas infrastructure in the project site vicinity would serve the proposed project, although additional connections would be necessary under the proposed project.

3.3.6.5 Potable Water

Water service would be provided to each of the proposed buildings to serve water fountains, sinks, showers, laundry, and other uses. Under the proposed project, water service laterals would be established to serve each building. The existing large-scale water infrastructure in the project site vicinity would serve the proposed project, although additional connections would be necessary under the proposed project.

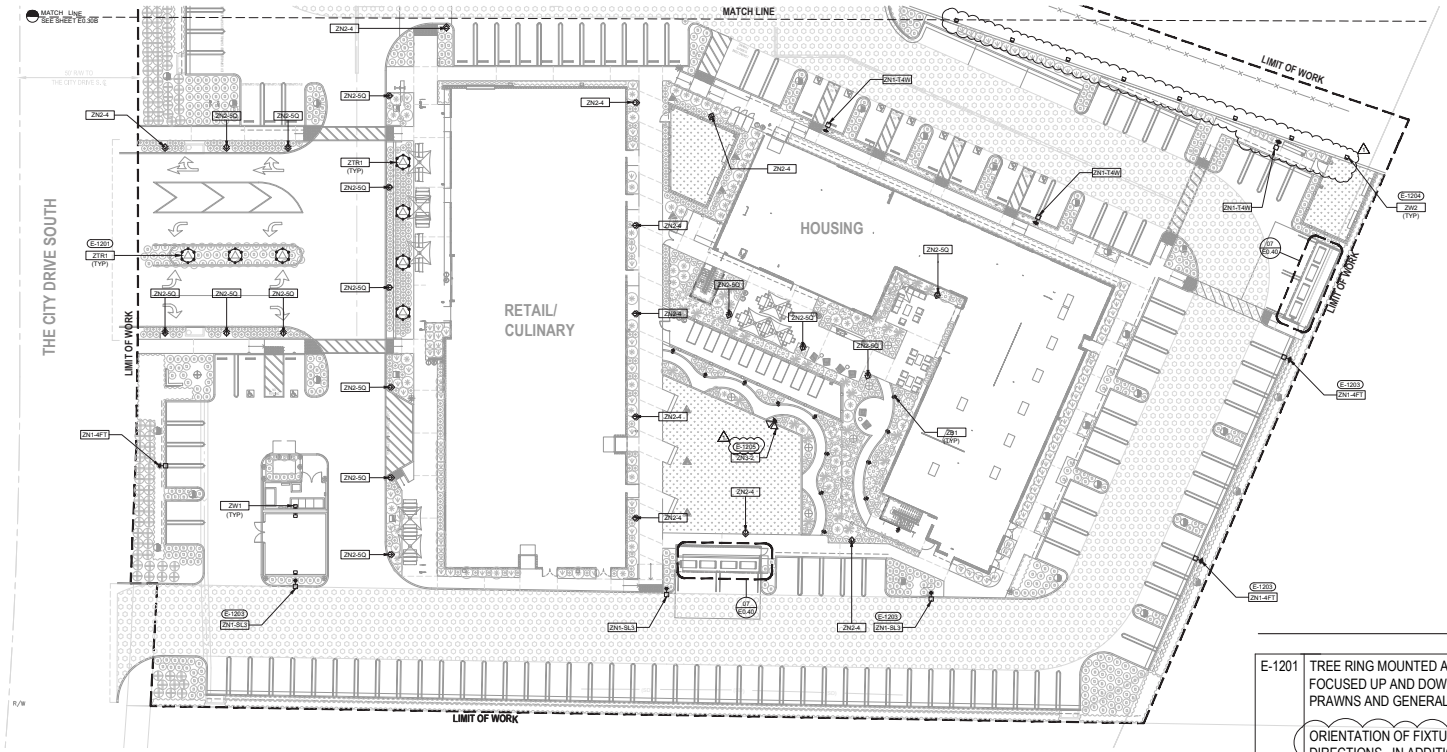
3.3.7 **Construction and Phasing**

Construction of the proposed project would comply with the CBC, the County Building Department Requirements, and additional vertical design criteria, including roof live load requirements, floor live load requirements, and vibration criteria. Construction of the proposed project would include the use of Tier 4 Interim construction equipment.

In addition, materials and construction would comply with mechanical and acoustic design requirements, minimum CBC solar readiness requirements, soil design criteria based on site-specific geotechnical and geohazard reports, and lateral design criteria including seismic, wind, and wall exterior cladding deflection.

Project construction is estimated to begin in the summer of 2026 and would last approximately 19 months, concluding in early 2028. During this period, construction equipment would be staged within the project site. Construction vehicles would access the project site via The City Drive South.

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KEY NOTES

E-1201	TREE RING MOUNTED ADJUSTABLE LIGHTS TO BE LOCATED AT 12'-0". FIXTURES TO BE FOCUSED UP AND DOWN TO PROVIDE ILLUMINATION ONTO UNDERSIDE OF PALM TREE PRAWNS AND GENERAL ILLUMINATION DOWN ONTO GROUND. ORIENTATION OF FIXTURES SHOWN ON PLAN REPRESENT GENERAL ORIENTATION/AIMING DIRECTIONS. IN ADDITION TO ORIENTING FIXTURES ON PLAN, CONTRACTOR IS TO SCHEDULE AIMING SESSION(S) WITH LIGHTING DESIGNER TO FINALIZE AIMING; REFER TO GENERAL NOTE #19 ON SHEET E5.10 FOR MORE INFORMATION.
E-1202	PV CANOPY BID ALT: CONTRACTOR TO PROVIDE SURFACE MOUNTED LINEAR TO UNDERSIDE OF CANOPY. PROVIDE PROPOSED FIXTURE OPTION, SURFACE MOUNTED LUMENBLADE SMALL (M80) APPROX. 33'-0" O.C. SPACING.
E-1203	SECURITY CAMERA PROVIDED BY AV CONTRACTOR, MOUNTED TO PARKING LOT/ROADWAY POLE LIGHT AT 12'-0" A.F.G., WITH A 120V POWER CONNECTION MOUNTED AT 9'-0" A.F.G. REFER TO SECURITY DRAWINGS FOR DETAIL.
E-1204	EXTERIOR WALL PACKS TO BE MOUNTED ON CMU WALL. MOUNTING HEIGHT AND FIXTURE SPEC TO MATCH EXISTING LIGHT FIXTURES ALONG EXISTING WALL PARALLEL TO RIVER.
E-1205	ORIENTATION OF FIXTURES SHOWN ON PLAN REPRESENT GENERAL ORIENTATION/AIMING DIRECTIONS. IN ADDITION TO ORIENTING FIXTURES ON PLAN, CONTRACTOR IS TO SCHEDULE AIMING SESSION(S) WITH LIGHTING DESIGNER TO FINALIZE AIMING; REFER TO GENERAL NOTE #19 ON SHEET E5.10 FOR MORE INFORMATION.

LSA

FIGURE 3-12

NO SCALE

SOURCE: LPA

I:\O\OCY2001.51\G\Lighting_Plan.ai (2/26/2025)

County of Orange Workforce Reentry Center Project

Lighting Plan

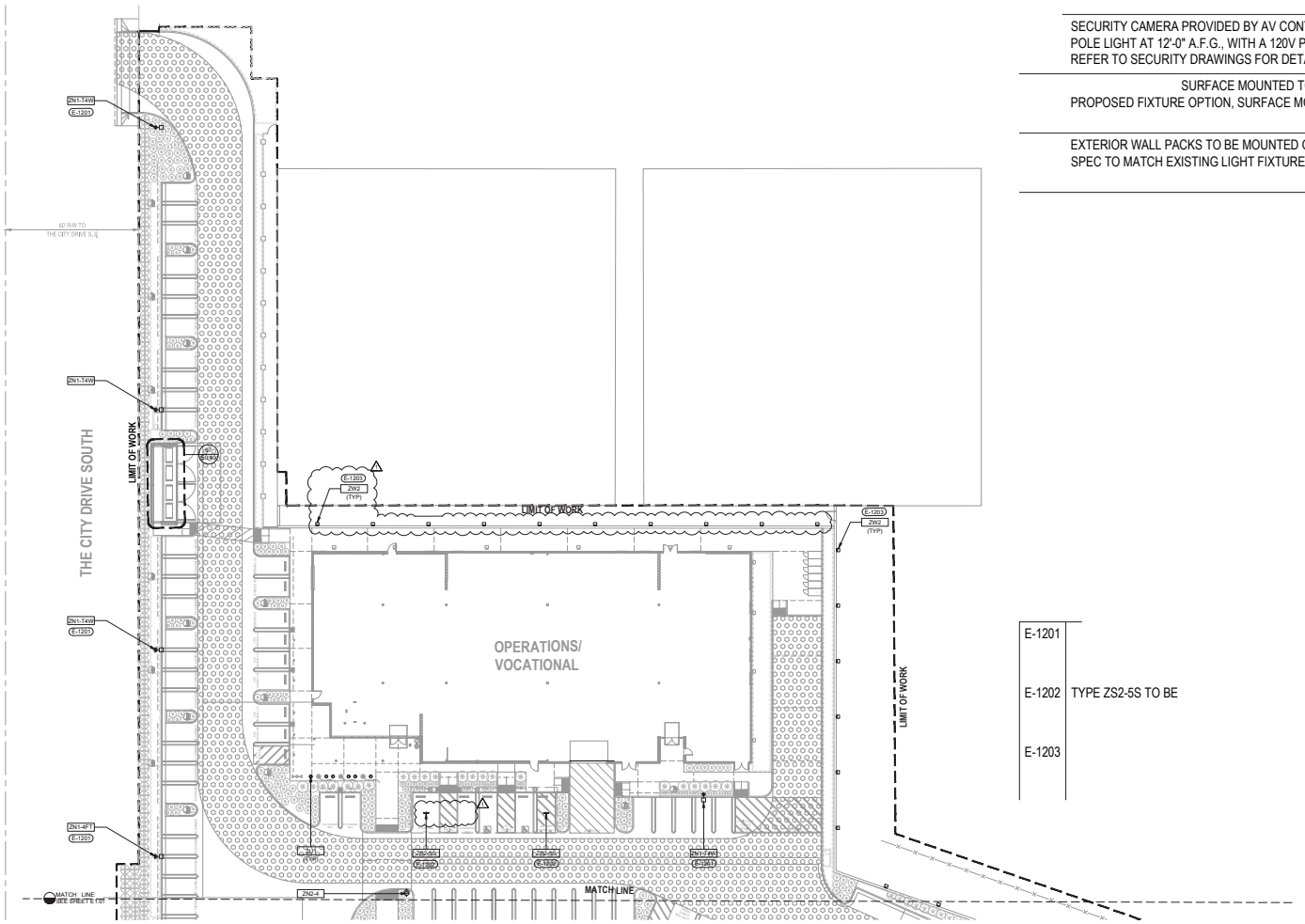
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KEY NOTES

SECURITY CAMERA PROVIDED BY AV CONTRACTOR, MOUNTED TO PARKING LOT/ROADWAY POLE LIGHT AT 12'-0" A.F.G., WITH A 120V POWER CONNECTION MOUNTED AT 9'-0" A.F.G. REFER TO SECURITY DRAWINGS FOR DETAIL.

SURFACE MOUNTED TO UNDERSIDE OF PV CANOPY. PROVIDE PROPOSED FIXTURE OPTION, SURFACE MOUNTED LUMENBLADE SMALL (M80).

EXTERIOR WALL PACKS TO BE MOUNTED ON CMU WALL. MOUNTING HEIGHT AND FIXTURE SPEC TO MATCH EXISTING LIGHT FIXTURES ALONG EXISTING WALL PARALLEL TO RIVER.



LSA

FIGURE 3-12
Page 2 of 2

NO SCALE

SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Lighting Plan

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3.3.7.1 Grading and Earthwork

As described in Section 3.2, above, the separate demolition project preceding construction of the proposed project did not involve ground-disturbance activities and simply demolished all existing structures to grade. As such, on-site grading and earthmoving activities would only take place under the proposed project, during demolition of the below-grade materials.

The existing grade on the project site is relatively flat. Under the proposed project, existing earth in the building footprint areas would be excavated and properly compacted. In addition, stumps, footings, utilities, and pavement remaining below grade from former on-site land uses would be demolished and removed under the proposed project. These disturbance activities are anticipated to reach a maximum depth of 16 feet below the existing ground surface. Deeper excavations could be conducted, as necessary, at the direction of the Geotechnical Engineer.

The total area planned for construction is approximately 6.9 acres, which includes both the approximately 4.6-acre project site as well as the approximately 2.3 acres of off-site roadway improvements.

Grading activities associated with the proposed project would involve movement of soils, including cut and fill. A net shortage is anticipated during grading activities, necessitating the importation of approximately 2,000 cubic yards (cy) of soil. Based on a standard haul truck capacity of 16 cy, this would require 10 two-way hauling truck trips to and from the project site per day to import/export this material.

3.3.8 Required Permits and Approvals

The County and other applicable agency approvals required for implementation of the proposed project may include, but are not limited to, the following:

County of Orange

- Adoption of the CEQA Final IS/MND
- Board of Supervisors Approval of Development Agreement with Guaranteed Maximum Price, Construction Agreement with State, Ground Lease, Right of Entry for Construction and Operation, Easement Agreement, Construction Contract, and Facility Sublease
- Approval of WQMP
- Approval of Plans, Specifications, and Estimates (PS&E)
- Temporary Construction Easements, if necessary

Santa Ana Regional Water Quality Control Board

- National Pollutant Discharge Elimination System (NPDES) Construction General Permit
- Section 401 Water Quality Certification

State Fire Marshal

- Plans and Specifications

City of Orange

- Fire Inspections – Site Access Only
- Approval of Off-Site/Traffic Signalization Improvements
- Tree Preservation Permit for trees within The City Drive South median, if applicable

Various Utility Companies

- Encroachment Permits

- Easements

Chapter 4: Environmental Evaluation

4.1 Analysis Methodology

Analysis of potentially significant impacts of each of the environmental factors identified in Table 4.A below is based on the project site environmental setting, project description, and the sample questions/ thresholds of significance. Potentially significant impacts that are reduced below the level of significance by sample questions/thresholds of significance will detail how the potentially significant impact is reduced. Potentially significant impacts that are unable to be reduced below the level of significance will detain the various mitigation options applied and why none would reduce the impact. Environmental factors for which the proposed project would have potentially significant impacts prior to mitigation are indicated by checked boxes in the following table.

Table 4.A: Environmental Factors Potentially Affected

☐ Aesthetics (4.5)	☐ Mineral Resources (4.16)
☐ Agriculture & Forestry Resources (4.6)	☒ Noise (4.17)
☐ Air Quality (4.7)	☐ Population & Housing (4.18)
☐ Biological Resources (4.8)	☐ Public Services (4.19)
☒ Cultural Resources (4.9)	☐ Recreation (4.20)
☐ Energy (4.10)	☒ Transportation (4.21)
☒ Geology and Soils (4.11)	☒ Tribal Cultural Resources (4.22)
☐ Greenhouse Gas Emissions (4.12)	☐ Utilities & Service Systems (4.23)
☒ Hazards & Hazardous Materials (4.13)	☐ Wildfire (4.24)
☐ Hydrology & Water Quality (4.14)	☐ Mandatory Findings (4.25)
☐ Land Use & Planning (4.15)	

The analysis will consider the whole of the actions and include:

- On-site impacts
- Off-site impacts
- Short-term construction impacts
- Long-term operational impacts
- Direct impacts
- Indirect impacts
- Cumulative impacts

4.2 Environmental Factors Potentially Affected

This document incorporates the Environmental Checklist Form from Appendix G of the *State CEQA Guidelines*.

Environmental factors unchecked in Table 4.A above indicate those topics for which the project was determined to result in no impacts, less than significant impacts, or less than significant impacts with regulatory compliance measures and standard conditions incorporated into the project.

Mitigation measures, regulatory compliance measures, and standard conditions are defined below:

- **Regulatory Compliance Measure (RCM):** A regulatory compliance measure is mandated by federal, State, regional, or local statutes and regulations. Because a regulatory compliance measure is derived from a legal requirement, it is applicable to all projects within a particular jurisdiction. A regulatory compliance measure is therefore not necessarily specific to individual projects and can be applicable regardless of whether any potentially significant impacts would occur under a proposed project. Failure to comply with a regulatory compliance measure could result in legal action against a project.
- **Standard Condition (SC):** A standard condition, or standard condition of approval, is established by a lead agency, in this case the County, and can be applicable to any project subject to discretionary approval by the lead agency. A standard condition is therefore not specific to individual projects and can be applicable regardless of whether any potentially significant impacts would occur under a proposed project. Failure to comply with a lead agency's standard condition(s), if applicable, can lead to revocation of permits or other consequences.
- **Mitigation Measure (MM):** As defined in *State CEQA Guidelines* Section 15126.4, a mitigation measure is a measure that could minimize significant adverse impacts of a proposed project and is required when significant adverse impacts could potentially occur. A mitigation measure is fully enforceable through permit conditions, agreements, or other legally-binding instruments, and is often tracked through a Mitigation Monitoring and Reporting Program (MMRP).

4.3 Thresholds of Significance

Thresholds of significance are identifiable quantitative, qualitative or performance level standards of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by a Lead Agency and compliance with which means the effect will normally be determined to be less than significant (*State CEQA Guidelines* §15064.7(a)).

With the exception of transportation vehicle miles traveled (VMT), the County has not adopted specific thresholds of significance and rather relies upon the specific questions relating to the topical environmental factors listed in Appendix G of the *State CEQA Guidelines* to assist in the determination of a potentially significant impact. The County Board of Supervisors adopted County VMT guidelines at its November 17, 2020, meeting pursuant to SB 743 to include VMT analysis methodology and thresholds. The implementation of SB 743 requires CEQA documents to include VMT analysis for land use projects.

4.4 Environmental Baseline

To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. *State CEQA Guidelines* Section 15125(a) states in pertinent part that the existing environmental setting will normally constitute the baseline physical conditions that will assist the County in a determining if an impact is significant.

Therefore, the environmental baseline for this project constitutes the existing physical conditions as they exist immediately preceding construction of the proposed project, which consists of a disturbed vacant lot following the demolition of on-site structures to grade.

4.5 *Aesthetics*

Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) 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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Question 4.5 a): Have a substantial adverse effect on a scenic vista?

Response to Question 4.5 a):

Less Than Significant Impact. The project site is in a relatively flat, urbanized portion of the City, directly north of SR-22. Surrounding land uses generally include government/institutional and commercial land uses.

Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. Similarly, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. Aesthetic components of a scenic vista generally include (1) scenic quality, (2) sensitivity level, and (3) view access. According to

the Natural Resources Element of the City's General Plan,[9] portions of the City are characterized by scenic vistas that include hillsides, ridgelines, or open space areas that provide a unifying visual backdrop to the urban environment. The closest scenic resource identified in the City's General Plan is located approximately 7.3 miles east of the project site and is not visible from the project site due to distance, terrain, and intervening urban development.

The project site is close to the Santa Ana River Trail, which is described as an open space corridor commonly used by the public for recreational purposes in the County's General Plan Resources Element.[10] The project site is set back from the Santa Ana River Trail by approximately 150 feet due to the presence of an intervening vehicle storage lot just east of the project site. Views of the project site from the Santa Ana River Trail are further obstructed by the presence of an existing cinderblock wall, which would remain in place under the proposed project.

Construction equipment to be used during construction of the proposed project would be staged within the project site and is not expected to be visible beyond the cinderblock wall mentioned above. Further, structures proposed under the project would be developed to a scale consistent with surrounding structures and allowable building heights under applicable building codes and planning documents. The proposed residential building would consist of two stories and would reach a height of approximately 23 feet (approximately 27 feet including the proposed mechanical screen), which falls well below the maximum allowable height of 50 feet for this building type under applicable development standards. The proposed retail/culinary building would consist of one story and would reach a maximum height of 25 feet, consistent with the 40-foot height maximum for this building type. The proposed vocational/office building would consist of two stories and would reach a maximum height of approximately 36 feet (approximately 45 feet including the proposed mechanical screen), consistent with the maximum allowable height of 55 feet. These structures would be similar in scale, if not smaller, than other buildings a similar distance from the Santa Ana River Trail, including the Theo Lacy Facility and the Orangewood Children's Home. Some of the structures associated with the Theo Lacy Facility and the Orangewood Children's Home properties are partially visible from the Santa Ana River Trail beyond the wall. Although it is reasonable to assume that the upper portions of the proposed structures may be partially visible from certain vantage points along the Santa Ana River Trail, this visibility would not obstruct any scenic views.

Lastly, off-site roadway improvements along The City Drive South and West Metropolitan Drive would be relatively minor and would not introduce any new elements to the roadway with the potential to create any new view obstructions.

Given the distance from the project site to the Santa Ana River Trail, the presence of a view-obstructing wall, and the relatively low heights of proposed structures, the proposed project would have less than significant impacts related to scenic vistas, and no mitigation is required.

[9] City of Orange General Plan. 2015. Natural Resources Element. December. Website: https://www.cityoforange.org/home/showpublisheddocument/210/637698172559270000 (accessed January 20, 2025).

[10] County of Orange. 2012a. General Plan Resources Element. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/40235.pdf (accessed January 20, 2025).

Question 4.5 b): Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Response to Question 4.5 b):

No Impact. The California Department of Transportation (Caltrans) manages the State Scenic Highway Program (see Streets and Highways Code Sections 260-263). The State Legislature created the State Scenic Highway Program to conserve and protect scenic highways and adjacent corridors from changes that would diminish their aesthetic value. A State highway may be designated scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. A scenic corridor is the land generally adjacent to and visible from a highway and is identified using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon.

State Scenic Highways can be classified as either "eligible" or "officially designated." The nearest designated State Scenic Highway to the project site is California State Route 91, which is approximately 4.8 miles northeast of the project site.[11] The project site is not visible from this designated State Scenic Highway given its distance and intervening urban development.

As mentioned in Response to Question 4.5 a), Policy 7.2 of the City's General Plan Natural Resources Element states that the City intends to designate Santiago Canyon Road, specifically the portion east of Jamboree Road, as a planned City Scenic Highway and to preserve the scenic nature of the open space adjacent to the road. This portion of Santiago Canyon Road is approximately 7.3 miles east of the project site, and the project site is not visible from this location.

Because the project site is not within the vicinity of a State or City Scenic Highway, the proposed project would have no impact on scenic resources including trees, rock outcroppings, and historic buildings within a State Scenic Highway, and no mitigation is required.

Question 4.5 c): 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?

Response to Question 4.5 c):

Less than Significant Impact.

Site Character and Quality. The project site is within an urbanized portion of the City and is surrounded by existing urban development. Existing structures formerly occupying the project site were demolished to grade under a separate project from April to May of 2025. As such, they are not considered under the existing environmental baseline for the proposed project. Instead, the existing condition for CEQA purposes is the post-demolition vacant lot, which is highly disturbed and contains no distinct aesthetic features.

[11] California Department of Transportation (Caltrans). 2019. State Scenic Highway Mapper. Website: https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed January 20, 2025).

As previously stated, the proposed project would consist of three new buildings as well as associated landscaping and hardscaping, including new pedestrian and vehicular circulation systems and surface parking. The proposed project also consists of off-site improvements to The City Drive South and West Metropolitan Drive to ensure safe vehicular access to the project site.

The proposed project would include various design elements to improve the aesthetic appearance of the site, including the placement of landscaping features in strategic locations near building perimeters and hardscaped areas.

All proposed development would be consistent with the policies set forth in the City's General Plan Public Facilities and Institutions (PFI) and General Commercial (GC) land use designations, and the design guidelines and development standards of the City's Public Institution (P-I) and Limited Business (C-1) zoning districts. As the proposed project intends to provide a welcoming and supportive environment to program participants and retail customers, there would be a positive impact on site character and quality. Therefore, the proposed project's impacts related to site character and quality would be less than significant, and no mitigation is required.

Surrounding Character and Quality. The area immediately surrounding the project site to the north and the west is heavily characterized by institutional and commercial uses, including the Theo Lacy Facility and the Outlets at Orange mall with adjacent surface parking. The project site is bordered by SR-22 to the south. The Santa Ana River and the Santa Ana River Bikeway, a Class I bicycle path, is to the west of the project site, separated from the project site by a vehicle storage lot and a cinderblock wall. Commercial and institutional development lies farther to the east between the Santa Ana River and I-5.

As previously stated, the project site and surrounding area are in areas designated for Public Facilities and Institutions (PFI) and Urban Mixed Use (UMIX) land uses by the City's General Plan and the Public Institution (P-I) zoning district under the City's Zoning Code. The proposed land uses are consistent with both the applicable General Plan land use and zoning and are also consistent with the overall character of surrounding land uses.

From the north, the project site is bounded by the Theo Lacy Facility. Traveling north on The City Drive South provides views of the Theo Lacy Facility, the western boundary of the project site, and SR-22. From the east, obstructed views of existing Theo Lacy structures may be seen from the Santa Ana River Trail Bikeway. From the south, SR-22, offers views of the project site. Views of chain-link fencing surrounding the project site and on-site parking lots can be seen from The City Drive South from the west.

As the proposed project would construct several structures on the project site with extensive landscaping and architectural design, the visual character and quality of public views of the project site would improve upon project completion. Therefore, public views around and from surrounding areas would not be adversely impacted by the proposed project, and impacts would be less than significant. No mitigation is required.

Question 4.5 d): Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Response to Question 4.5 d):

Less than Significant Impact. Under existing conditions, the project site produces exterior light and glare from security and street lighting. Existing sources of light in the project site vicinity are typical of urbanized areas and include streetlights and headlights on nearby roadways, building façade and interior lighting, and pole-mounted lighting in pedestrian and parking areas of adjacent developments. Lighting from existing surrounding development within the City also contributes to the background lighting in the project vicinity.

The proposed project would include the installation of new indoor and outdoor lighting throughout the facility, including interior lighting, site lighting, emergency egress lighting, and lighting controls. This would also include the removal of existing light fixtures from existing security walls and fences along the project site's interface with the Theo Lacy Facility and their replacement along new security walls and fences. These light sources would use light-emitting diode (LED) luminaires designed to minimize light pollution and glare while also meeting applicable light distribution requirements. In addition, all exterior lighting and egress emergency lighting would be in compliance with the latest edition of the Illuminating Engineering Society of North America Lighting Handbook, 10th Edition (2011) and the 2025 State Building Energy Efficiency Standards (Title 24), which governs structural safety and sustainability for California's public buildings. Additionally, the proposed project would include architectural exterior canopies for both architectural enhancement and daylight/glare control. Figure 3-12, Lighting Plan, in Section 3.0, Project Description, of this IS/MND depicts the location and orientation of lighting fixtures throughout the project site. Proposed lighting fixtures would include tree ring mounted adjustable lights, exterior wall pack lights mounted onto the CMU wall to be developed surrounding the project site, pole lighting, and lighting along photovoltaic canopies.

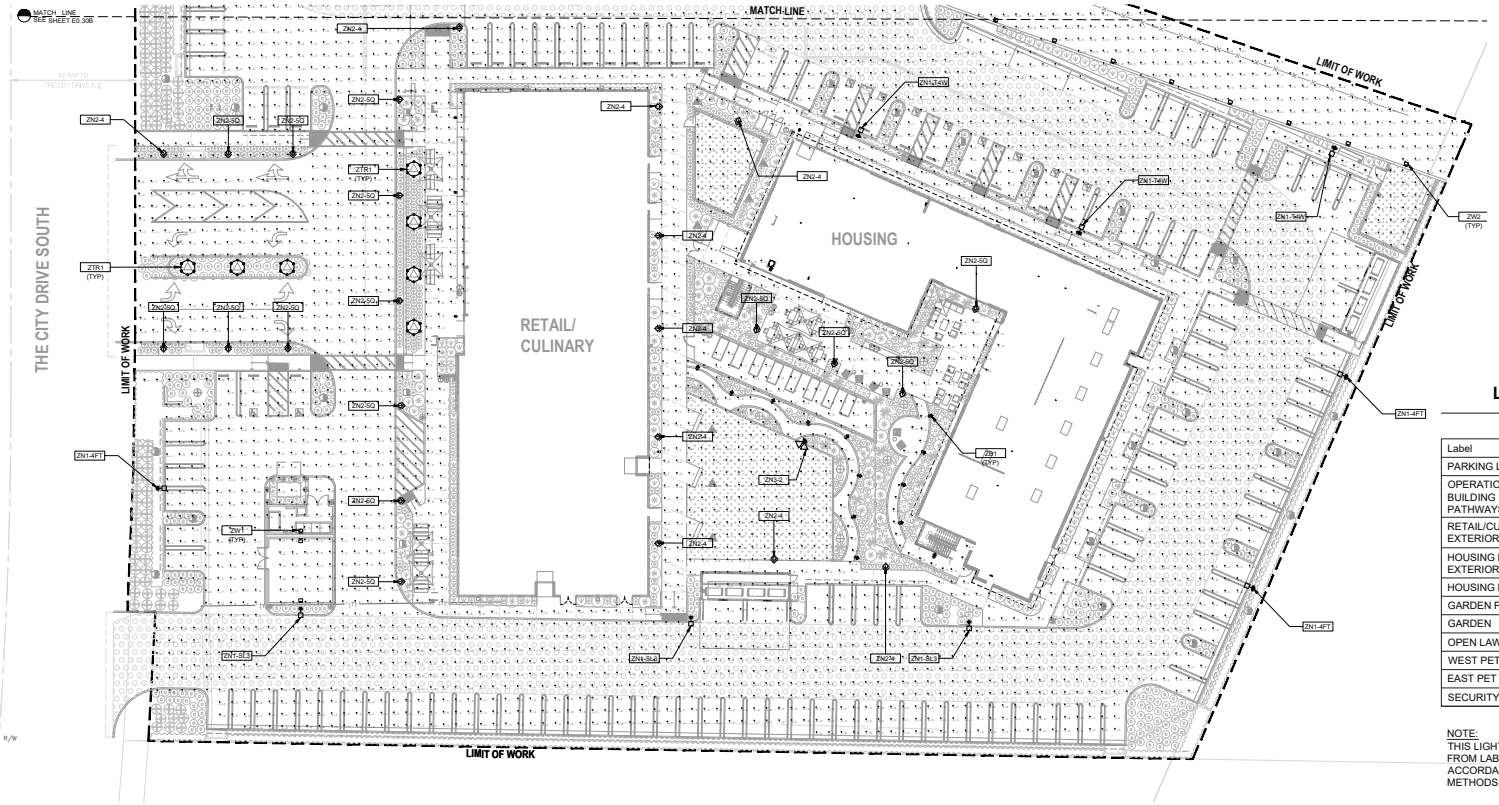
The proposed lighting sources would be similar to other lighting sources in the project site vicinity and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity and ambient light during the day and night. Further, the proposed project would comply with Section 7-9-67 of the County's Zoning Code, which states that "all lighting shall be designed and located so as to confine direct rays to the premises."[12] Figure 4.1-1, Photometric Lighting Plan, depicts illumination levels of proposed exterior lighting.

As demonstrated in Figure 4.1-1, the placement of outdoor lighting fixtures under the proposed project would comply with all applicable provisions of the 2022 CBC, including illumination at no less than one footcandle at any point along the path of egress. As shown in the figure, outdoor lighting sources would be evenly spaced out throughout the project site to ensure that outdoor areas are not under or over-illuminated. As such, the design of the proposed project would minimize lighting spillover toward surrounding land uses.

In addition to light fixture design considerations as discussed above, landscaping associated with the proposed project would also be designed in a manner to shield surrounding land uses from potential glare. With adherence to the County's Zoning Code and given the illumination of the project site under existing conditions, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the surrounding urban area. Impacts would be less than significant, and no mitigation is required.

[12] County of Orange. 2024. County of Orange Comprehensive Zoning Code. July 25. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/2024-08/Adopted%20Orange%20County%20Zoning%20Code%207-25-24.pdf.

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LIGHTING ILLUMINANCE (FC) SUMMARY

Label	LLF	Avg	Max	Min	Avg/Min
PARKING LOT	0.85	2.4 fc	9.3 fc	1.0 fc	2.4:1
OPERATIONS/VOCATIONAL BUILDING EXTERIOR PATHWAYS	0.85	3.8 fc	9.0 fc	1.5 fc	2.6:1
RETAIL/CULINARY BUILDING EXTERIOR PATHWAYS	0.85	2.8 fc	11.2 fc	1.0 fc	2.8:1
HOUSING BUILDING EXTERIOR PATHWAYS	0.85	2.4 fc	9.9 fc	1.0 fc	2.4:1
HOUSING BUILDING PATIO	0.85	2.5 fc	16.8 fc	1.1 fc	2.2:1
GARDEN PATHWAYS	0.85	3.5 fc	11.2 fc	1.0 fc	3.5:1
GARDEN	0.85	1.6 fc	2.5 fc	0.9 fc	2.7:1
OPEN LAWN	0.85	1.7 fc	2.9 fc	1.0 fc	1.7:1
WEST PET RELIEF	0.85	2.5 fc	4.0 fc	1.1 fc	2.3:1
EAST PET RELIEF	0.85	2.3 fc	2.9 fc	1.4 fc	1.6:1
SECURITY CONTROL ZONE	0.85	8.5 fc	12.1 fc	2.4 fc	3.5:1

NOTE:
THIS LIGHTING CALCULATION REPRESENTS ILLUMINATION LEVELS CALCULATED FROM LABORATORY DATA TAKEN UNDER CONTROLLED CONDITIONS IN ACCORDANCE WITH ILLUMINATING ENGINEERING SOCIETY (IES) APPROVED METHODS.

LEGEND OF REFLECTANCES

SURFACE REFLECTANCES ARE ASSUMED STANDARDS USED IN CALCULATION MODEL.

KEYNOTES

(E-1201) CIRCLES DRAWN AROUND LUMINAIRES WITH OUTPUTS OF HIGHER THAN 6200LM SHOW A RADIUS OF A SINGLE MOUNTING HEIGHT RELATIVE TO EACH FIXTURE; SEE TABLE ON SHEET E9.12 SHOWING COMPLIANCE WITH MAX ALLOWABLE BUG RATINGS BASED ON SHORTEST DISTANCES TO PROJECT BOUNDARY.

(E-1202) PROJECT BOUNDARY REPRESENTED WITH HEAVY DASHED LINE (TYP).

LSA

FIGURE 4.5-1
Page 1 of 2

NO SCALE

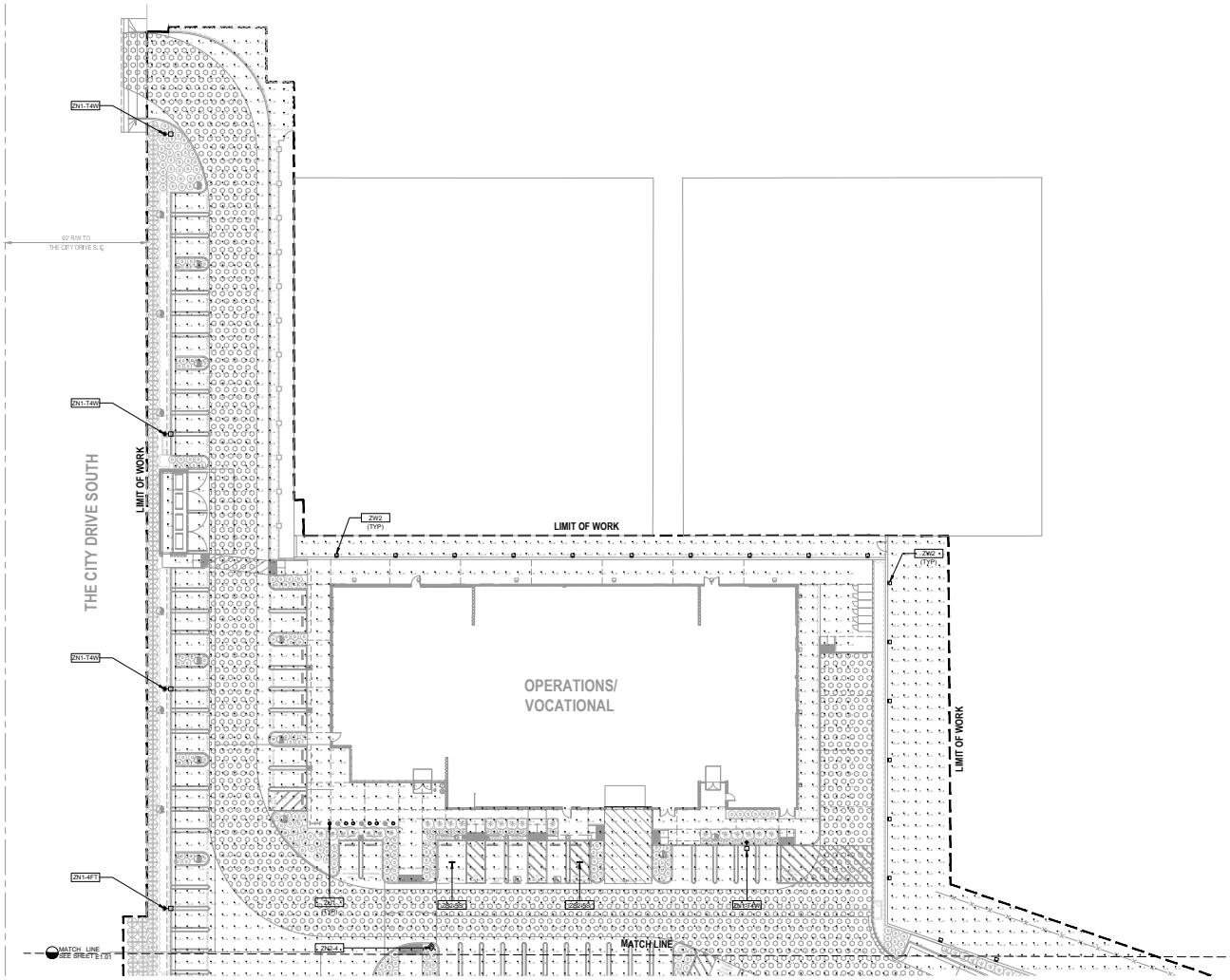
SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Photometric Lighting Plan

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LIGHTING ILLUMINANCE (FC) SUMMARY

Label	LLF	Avg	Max	Min	Avg/Min
PARKING LOT	0.85	2.4 fc	9.3 fc	1.0 fc	2.4:1
OPERATIONS/VOCATIONAL BUILDING EXTERIOR PATHWAYS	0.85	3.8 fc	9.0 fc	1.5 fc	2.6:1
RETAIL/CULINARY BUILDING EXTERIOR PATHWAYS	0.85	2.8 fc	11.2 fc	1.0 fc	2.8:1
HOUSING BUILDING EXTERIOR PATHWAYS	0.85	2.4 fc	9.9 fc	1.0 fc	2.4:1
HOUSING BUILDING PATIO	0.85	2.5 fc	16.8 fc	1.1 fc	2.2:1
GARDEN PATHWAYS	0.85	3.5 fc	11.2 fc	1.0 fc	3.5:1
GARDEN	0.85	1.6 fc	2.5 fc	0.9 fc	2.7:1
OPEN LAWN	0.85	1.7 fc	2.9 fc	1.0 fc	1.7:1
WEST PET RELIEF	0.85	2.5 fc	4.0 fc	1.1 fc	2.3:1
EAST PET RELIEF	0.85	2.3 fc	2.9 fc	1.4 fc	1.6:1
SECURITY CONTROL ZONE	0.85	8.5 fc	12.1 fc	2.4 fc	3.5:1

NOTE:
THIS LIGHTING CALCULATION REPRESENTS ILLUMINATION LEVELS CALCULATED FROM LABORATORY DATA TAKEN UNDER CONTROLLED CONDITIONS IN ACCORDANCE WITH ILLUMINATING ENGINEERING SOCIETY (IES) APPROVED METHODS.

LEGEND OF REFLECTANCES

SURFACE REFLECTANCES ARE ASSUMED STANDARDS USED IN CALCULATION MODEL.

KEYNOTES

(E-1201) CIRCLES DRAWN AROUND LUMINAIRES WITH OUTPUTS OF HIGHER THAN 6200LM SHOW A RADIUS OF A SINGLE MOUNTING HEIGHT RELATIVE TO EACH FIXTURE; SEE TABLE ON SHEET E9.12 SHOWING COMPLIANCE WITH MAX ALLOWABLE BUG RATINGS BASED ON SHORTEST DISTANCES TO PROJECT BOUNDARY.

(E-1202) PROJECT BOUNDARY REPRESENTED WITH HEAVY DASHED LINE (TYP).

LSA

FIGURE 4.5-1
Page 2 of 2

N

NO SCALE

SOURCE: LPA

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County of Orange Workforce Reentry Center Project

Photometric Lighting Plan

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4.6 *Agriculture and Forestry Resources*

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004)g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
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 forest land to non-forest use?	☐	☐	☐	☒

Question 4.6 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?

Response to Question 4.6 a):

No Impact. The project site is located in the City of Orange, a majority of which is urbanized and developed. Pursuant to Government Code Section 65570, the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) compiles consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. The FMMP provides maps and statistical data to the public, academia, and local, State, and federal governments on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. According to the DOC's California Important Farmland Finder, the entirety of the project site is designated as Urban and Built-Up Land, which is defined as land that is occupied by structures with a

building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel.[13] The project site has been highly disturbed by the development of previous land uses and does not contain any agricultural soils. As indicated by the DOC's California Important Farmland Finder results, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not convert any existing Farmland to a non-agricultural use. No impact would occur, and no mitigation is required.

Question 4.6 b): Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Response to Question 4.6 b):

No Impact. The California Land Conservation Act of 1965, commonly known as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses. In return, landowners are given a lower property tax assessment. According to the California Williamson Act Enrollment Finder, the County did not report Williamson Act data in 2023.[14] Additionally, the City's General Plan Program Environmental Impact Report (EIR) states that no Williamson Act contracts exist within the City's planning area.[15] As previously stated, the existing zoning on the project site consists of Public Institution (P-I) and Limited Business (C-1) designations, neither of which permit agricultural uses. Therefore, the proposed project does not conflict with any agricultural zoning or Williamson Act contract sites. No impact would occur, and no mitigation is required.

Question 4.6 c): Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004)(g))?

Response to Question 4.6 c):

No Impact. The project site is not within an area zoned for forest land, timberland, or timberland zoned Timberland Production, nor would it result in rezoning of these resources. Therefore, no impact would occur, and no mitigation is required.

Question 4.6 d): Result in the loss of forest land or conversion of forest land to non-forest use?

Response to Question 4.6 d):

No Impact. As described above, the project site has been previously developed and does not contain forest land. Accordingly, the proposed project would not result in the loss or conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

Question 4.6 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 forest land to non-forest use?

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13 California Department of Conservation. n.d.-a. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed January 20, 2025).

14 California Department of Conservation. n.d.-b. California Williamson Act Enrollment Finder. Website: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html (accessed January 20, 2025).

15 City of Orange. 2010b. General Plan Program EIR, Section 5.2 Agricultural Resources. Website: https://www.cityoforange.org/home/showpublisheddocument/240/637698173340500000 (accessed January 20, 2025).

Response to Question 4.6 e):

No Impact. Refer to the responses above. The proposed project would not affect any farmland or forest land. No impact would occur, and no mitigation is required.

4.7 *Air Quality*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors affecting a substantial number of people?	☐	☐	☒	☐

The project site is within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the Basin. The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants (referred to as "criteria pollutants"). Under these respective laws, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for criteria pollutants, designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), particulate matter that is less than 10 microns in diameter (PM_{10}), sulfur dioxide (SO_2), and lead . Secondary criteria pollutants include ozone (O_3), and particulate matter that is less than 2.5 microns in diameter ($PM_{2.5}$). The ambient air quality standard for each criteria pollutant represents the level that is considered safe to the public and avoids specific adverse health effects associated with each criteria pollutant.

The Basin is in nonattainment of the federal and State standards for O_3 and $PM_{2.5}$, and in nonattainment of the State PM_{10} standard. The SCAQMD has established project-level thresholds for VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$, shown in Table 4.7.A. The SCAQMD considers any project in the Basin with construction- or operation-related emissions that exceed any of the emission thresholds shown in Table 4.7.A to have potentially significant impacts.

Table 4.7.A: SCAQMD Construction and Operation Thresholds of Significance

Emission Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Thresholds	75	100	550	150	150	55
Operation Thresholds	55	55	550	150	150	55

Source: South Coast Air Quality Management District (1993).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide
VOC = volatile organic compounds

The SCAQMD published its Final Localized Significance Threshold Methodology in June 2003 (updated July 2008), recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[16] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) have been established based on the size or total area of the emission source, the ambient air quality in the Source Receptor Area (SRA), and the distance between the project and the nearest sensitive receptor. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather as sensitive receptors (i.e., residences, schools, hospitals, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields). The closest sensitive receptors to the project site are residences located approximately 766 feet southeast of the project site, as measured from the project site boundary to the nearest residential building façade.[17] The Orangewood Children's Home, located approximately 780 feet north of the project site, from the project site boundary to the building façade, is also identified as a sensitive receptor.

LSTs are based on the ambient concentrations of a particular pollutant within the project SRA and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is Central Orange County (SRA 17). The SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As mentioned above, the closest sensitive receptors to the project site are the residences approximately 766 feet (233 meters) southeast of the project site, as measured from the project boundary line to the nearest residential building façade. The project site is 4.6 acres; therefore, the construction and operational LST is based on the maximum 5.0-acre threshold.[18] Table 4.7.B shows the emissions thresholds that would apply based on the project site's size and distance to nearby receptors during project construction and operations, respectively.

[16] South Coast Air Quality Management District (SCAQMD). 2008. Final Localized Significance Threshold Methodology. July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed March 3, 2025).

[17] It should be noted that while the Theo Lacy Facility is directly adjacent to the northern project site boundary, this facility does not meet the criteria for consideration as a sensitive receptor.

[18] SCAQMD. n.d.-a. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod- guidance.pdf (accessed March 3, 2025).

Table 4.7.B: SCAQMD Localized Significance Thresholds

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction (5.0-acres, 766-foot distance)	207	4,603	99	40
Operations (5.0-acres, 766-foot distance)	207	4,603	25	10

Source: Final Localized Significance Threshold Methodology (SCAQMD 2008).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District

Question 4.7 a): Conflict with or obstruct implementation of the applicable air quality plan?

Response to Question 4.7 a):

Less than Significant Impact. An Air Quality Management Plan (AQMP) describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into attainment of federal and State ambient air quality standards (AAQS). The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. Therefore, the Basin is classified as a nonattainment area and an AQMP is required. The applicable air quality plan is the SCAQMD's adopted 2022 AQMP.[19] The AQMP is based on regional growth projections developed by the Southern California Association of Governments (SCAG).

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review given that the air quality plan strategy is based on projections from local General Plans.

The proposed project would construct a new workforce reentry center that would include an office/vocational building, a retail/culinary building, and a supportive housing and services building, with a total combined building area of 80,364 sf. The proposed project is not considered a project of statewide, regional, or area-wide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 sf of floor space) as defined in the California Code of Regulations (Title 14, Division 6, Chapter 3, Article 13, § 15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet SCAG's Intergovernmental Review criteria.

The County's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in the SCAQMD CEQA Air Quality Handbook, consistency with the Basin 2022 AQMP is affirmed when a project: (1) would not increase the frequency

[19] SCAQMD. 2022 Air Quality Management Plan. December 2. Website: aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16 (accessed March 3, 2025).

or severity of an air quality standards violation or cause a new violation and (2) is consistent with the growth assumptions in the AQMP. A consistency review is presented as follows:

1. The proposed project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance thresholds for emissions established by SCAQMD, as demonstrated in Response 4.7(b), below. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. The proposed project would construct a new workforce reentry center that would include an office/vocational building, a retail/culinary building, and a supportive housing and services building for a total combined building area of 80,364 sf. Given that the proposed project does not match the description of the significant project types listed above, the proposed project would not be defined as significant under the CEQA Air Quality Handbook, the proposed project would not be defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning, and would be consistent with the City's General Plan and Zoning Ordinance.

Based on the consistency analysis presented above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

Question 4.7 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?

Response to Question 4.7 b):

Less than Significant Impact. As identified above, the Basin is currently designated as being in nonattainment of the federal and State standards for O_3 and $PM_{2.5}$. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, to result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified in Table 4.7.A, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by site preparation and grading activities. Emissions from construction equipment are also anticipated and would include CO, NO_X, VOC, directly emitted $PM_{2.5}$ or PM_{10}, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include demolition, site preparation, grading, building construction, utilities/trenching, architectural coating, and paving activities. However, demolition activities would be limited to only building foundations and pavement. Demolition of the existing structures on-site is considered a separate project and is not included as part of the analysis. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the County to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:[20]

- Watering active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).

- Covering all trucks hauling dirt, sand, soil, or other loose materials, or maintaining at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

- Reducing traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions would increase slightly due to vehicles idling in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod) version 2022.1. As described in Chapter 3, Project Description, project construction is estimated to begin in the summer of 2026 and would last approximately 19 months, concluding in early 2028. The project would demolish a total of 161,172 sf of building foundations and pavement. As described above, demolition would be limited to only building foundations and pavement. Demolition of the structures that were on-site were demolished as a separate project due to nuisance, health, and safety

[20] SCAQMD. n.d.-b. Rule 403: Fugitive Dust. Website: www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf (accessed March 3, 2025).

concerns and is not included as part of the analysis. As provided by the Project Applicant, construction equipment would consist of excavators, dumpers/tenders, loaders, rough terrain forklifts, generator sets, sweeper/scrubbers, trenchers, pumps, air compressors, compactors, paving equipment, and other general construction equipment, which was included in CalEEMod. This analysis assumes the use of Tier 4 Interim construction equipment and that equipment would operate 8 hours per day. In addition, this analysis assumes compliance with SCAQMD Rule 403 and Rule 1113 measures. SCAQMD Rule 1113 addresses emissions from use of architectural coatings.[21] Furthermore, the proposed project would require the import of 2,000 cubic yards of soil, which was included in CalEEMod. Approximately 60 workers would be required for the pouring of the project's foundation, 26 workers for the grading phase, 250 workers for the building construction phase, 8 workers for utilities/trenching, and 16 workers for exterior improvements and paving. All of these assumptions were also included in CalEEMod. All other construction details are not yet known; therefore, default assumptions (e.g., construction truck trips, fleet activities, construction equipment emission factors) from CalEEMod were used. Construction emissions are summarized in Table 4.7.C below. Appendix A provides CalEEMod output sheets.

Table 4.7.C: Short-Term Regional Construction Emissions

Construction Year	Total Daily Regional Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Demolition	34.3	20.0	62.1	0.1	14.5	3.1
Site Preparation	0.2	5.1	7.1	<0.1	0.3	0.2
Grading	0.5	13.7	21.1	<0.1	0.7	0.3
Building Construction	1.5	15.2	35.1	<0.1	4.4	1.2
Utilities/Trenching	0.2	5.8	6.7	<0.1	0.2	0.1
Paving	0.3	4.9	7.0	<0.1	0.3	0.1
Architectural Coating	2.3	2.8	6.3	<0.1	0.2	0.1
Peak Daily Emissions	**34.3**	**23.6**	**62.1**	**0.1**	**14.5**	**3.1**
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA Associates, Inc. (May 2025).
Note: Peak daily emissions of NO_X occurred during the overlapping of building construction, utilities/trenching, and architectural coating phases..
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 4.7.C, construction emissions associated with the project would not exceed the SCAQMD's thresholds for VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Impacts would be less than significant, and no mitigation is required.

Operational Emissions. Long-term air pollutant emissions associated with operation of the proposed project include emissions from mobile, energy, area, and stationary sources, as discussed below. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source.

[21] SCAQMD. n.d.-c. Rule 1113: Architectural Coatings. Website: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf (accessed May 1, 2025).

Mobile source emissions include reactive organic gas (ROG)/VOC and NO_X emissions that contribute to the formation of ozone. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Energy-source emissions result from activities in buildings that use natural gas. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. The proposed project would include the use of natural gas, limited to the culinary kitchen. All of the other buildings would be designed to be all electric.

Area source emissions associated with the project would include emissions from the use of landscaping equipment and consumer products. Stationary source emissions would be associated with the use of the backup diesel generator.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. The proposed project would construct a new workforce reentry center that would include an office/vocational building, a retail/culinary building, and a supportive housing and services building for a total combined building area of 80,364 sf. Therefore, the proposed project analysis was conducted using land use codes *Congregate Care (Assisted Living), Strip Mall, General Office Building*, and *Parking Lot.* The *Strip Mall* land use was relied upon to represent the proposed retail and culinary building. Additional background regarding the trip generation rates used in CalEEMod for the project is provided in Section 4.21, Transportation, which determined that the proposed project would generate 491 average daily trips. As mentioned above, natural gas use would be limited to the culinary kitchen, with the rest of the buildings designed to be all electric. These conditions were included in CalEEMod. The proposed project would also include features such as EV/bike parking, low flow water fixtures, and drought tolerant landscaping, which were also incorporated in CalEEMod. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions. Operational emissions associated with the proposed project are summarized in Table 4.7.D below. Appendix A provides CalEEMod output sheets.

Table 4.7.D: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	1.4	1.0	10.5	<0.1	2.7	0.7
Area Sources	2.4	<0.1	4.3	<0.1	<0.1	<0.1
Energy Sources	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Total Project Emissions	**3.8**	**1.0**	**14.8**	**<0.1**	**2.7**	**0.7**
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA Associates, Inc. (May 2025).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 4.7.D, the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Impacts would be less than significant, and no mitigation is required.

Long Term Microscale (CO Hot Spot) Analysis. Although the Basin is designated as being in attainment/ maintenance of the AAQS for CO, localized CO concentrations are evaluated to determine whether project-related CO impacts would exceed State or national AAQS. This is because vehicular trips associated with the proposed project could contribute to congestion at intersections and along roadway segments in the project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate vicinity of the project site are not available. Ambient CO levels monitored at the Anaheim air quality monitoring station at 812 West Vermont Street, the closest station to the project site, showed a highest recorded 1-hour concentration of 2.5 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.9 ppm (the State standard is 9 ppm) during the past three years. The highest CO concentrations would normally occur during peak traffic hours; therefore, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

As discussed in Section 4.21, Transportation, operation of the proposed project is estimated to generate 81 a.m. peak-hour trips and 92 p.m. peak-hour trips. As the proposed project is not expected to generate 100 or more a.m. or p.m. peak-hour trips, it is assumed that the addition of the proposed project traffic would not contribute substantial traffic volumes to nearby intersections. Additionally, the proposed project is defined as a public institution providing vocational and housing accommodation for adult individuals involved in the criminal justice system or other County systems of care. Therefore, the proposed project qualifies for project-type screening and is presumed to have a less than significant impact on VMT. Given the extremely low level of CO concentrations in the vicinity of the project site, and lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly to CO concentrations or contribute to the result of CO concentrations exceeding the State or federal CO standards. Because no CO hot spot would occur, as identified in the proposed project, there would be no project-related impacts on CO concentrations. Impacts would be less than significant, and no mitigation is required.

Question 4.7 c): Expose sensitive receptors to substantial pollutant concentrations?

Response to Question 4.7 c):

Less than Significant Impact. Sensitive receptors are people who have an increased sensitivity to air pollution or environmental contaminants. As previously discussed, the SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors.

LSTs are based on the ambient concentrations of a particular pollutant within the project site's SRA and the project site's distance to the nearest sensitive receptor. As discussed above under Response to Question 4.7b, the closest sensitive receptors to the project site are the residences located approximately 766 feet southeast of the project site, as measured from the project boundary line to the residential building façade. Table 4.7.E and Table 4.7.F shows the results of the LST analysis based on a 5.0-acre daily disturbance area for construction and operation of the site at a distance of 766 ft (233 meters).

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table 4.7.F assume all area and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. Table 4.7.F indicates the localized operational emissions would not exceed the LSTs at nearby sensitive receptors. Therefore, the proposed operational activity would not result in a locally significant air quality impact.

As detailed in Tables 4.7.E and 4.7.F, the emission levels indicate that the project would not exceed SCAQMD LSTs during project construction or operation. The project's peak operational on-site NO_X emissions are estimated to be approximately less than 1 pound per day. Due to the small size of the proposed project in relation to the size of the overall Basin, the level of emissions would not be sufficiently high enough to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project would be incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects, and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the proposed project would not expose sensitive receptors to substantial levels of pollutant concentrations. Impacts would be less than significant, and no mitigation would be required.

Table 4.7.E: Project Localized Construction Emissions (in Pounds Per Day)

Source	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Project Emissions	4.8	54.8	10.9	2.0
Localized Significance Threshold	**207.0**	**4,603.0**	**99.0**	**40.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (May 2025) using the SCAQMD Final Localized Significance Threshold Methodology (July 2008).
Note: Source Receptor Area 17, based on a 5-acre construction disturbance daily area, at a distance of 233 meters (766 feet) from the project site boundary.
CO = carbon monoxide $PM_{2.5}$ = particulate matter less than 2.5 microns in size
NO_X = nitrogen oxides PM_{10} = particulate matter less than 10 microns in size

Table 4.7.F: Project Localized Operational Emissions (in Pounds Per Day)

Source	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Project Emissions	0.1	4.8	<0.1	<0.1
Localized Significance Threshold	**207.0**	**4,603.0**	**25.0**	**10.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Compiled by LSA Associates, Inc (May 2025) using the SCAQMD Final Localized Significance Threshold Methodology (July 2008).
Note: Source Receptor Area 17, 5 acres, 233 meters (766 feet) distance; on site traffic is assumed to be 5 percent of total.
CO = carbon monoxide $PM_{2.5}$ = particulate matter less than 2.5 microns in size
NO_X = nitrogen oxides PM_{10} = particulate matter less than 10 microns in size

Naturally Occurring Asbestos. The project site is in Orange County, which is among the counties found to have serpentine and ultramafic rock in their soils.[22] Asbestos is commonly found in serpentine and ultramafic rock. However, according to the California Geological Survey, no such rock has been identified in the project site vicinity. As such, the potential risk for naturally occurring asbestos during project construction is very low and would be considered to be less than significant.

Based on the analysis presented above, impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant, and no mitigation is required**.**

Question 4.7 d): Result in other emissions (such as those leading to odors) affecting a substantial number of people?

Response to Question 4.7 d):

Less than Significant Impact. Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease once construction is completed. No other sources of objectionable odors have been identified for the proposed project.

SCAQMD Rule 402: Nuisance, states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."[23] Once operational, the proposed uses are not anticipated to emit any objectionable odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

[22] California Department of Conservation (DOC) and California Geological Survey. n.d. Asbestos. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards (accessed March 3, 2025).

[23] SCAQMD. 1976. Rule 402. May 7. Website: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf (accessed May 1, 2025).

4.8 *Biological Resources*

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

Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
f) Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following analysis is based upon information presented in the *Biological Resources Assessment* (BRA) prepared for the proposed project by LSA in March 2025 and included as Appendix B to this IS/MND. It should be noted that the field survey was conducted and the BRA was prepared prior to the demolition of the animal shelter structures and the removal of the vegetation on the project site, which occurred in April and May 2025. Although photographs and analysis presented in the BRA include on-site structures and vegetation that are no longer present, the existing condition of the project site is a vacant disturbed lot for the purposes of the environmental analysis in this IS/MND. As such, some of the measures discussed in the BRA for the purpose of biological resource protection (e.g., roosting bats) are no longer relevant and are not discussed further in the following analysis.

Question 4.8 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?

Response to Question 4.8 a):

Less than Significant Impact. Preparation of the BRA involved a literature review, record search, and field surveys by qualified biologists in order to determine the existence and potential for occurrence of sensitive or special-status plant and animal species[24] within the project site or its direct vicinity. Current electronic database reviews included the California Natural Diversity Database RareFind 5 tool, the Information for Planning and Consultation tool, and the United States Fish and Wildlife Service (USFWS) Natural Wetlands Inventory tool. In addition to these databases, the review included historic and current aerial imagery, existing environmental reports for developments in the project vicinity, and regional habitat conservation plans and local land use policies related to biological resources.

[24] For the purposes of this analysis, the term "special-status species" refers to those species that are listed or proposed for listing under the California and federal Endangered Species Acts (CESA and/or FESA, respectively); California Fully Protected Species; plants with a California Rare Plant Rank of 1, 2, or 3; California Species of Special Concern; and California Special Animals. It should be noted that "Species of Special Concern" and "California Special Animal" are administrative designations made by the CDFW and carry no formal legal protection status. However, Section 15380 of the *State CEQA Guidelines* indicates that these species should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

An initial field survey conducted on January 13, 2025 included a pedestrian review of general site conditions, vegetation, and suitability of habitat for various special-status species. In addition to the general field survey, a bat emergence survey was conducted on February 27, 2025, to determine whether bats were roosting within any of these suitable habitat areas on the project site. This survey involved the use of infrared light and ultrasound detection technology to observe the trees for the presence of bats.

Please refer to the BRA for a full list of existing and special interest plant and animal species detected and potentially present within the project site (biological resource study area). Vegetation within the project site was determined to largely consist of ornamental landscaping, including smilo grass (*Stipa miliaceae*), crimson fountain grass (*Cenchrus setaceus*), and prickly lettuce (*Lectuca serriola*). Various ornamental tree species were also observed on site, including ash tree (*Fraxinus* sp.), silk oak (*Grevillea robusta*), Russian olive (*Elaeagnus angustifolia*), chinaberry (*Melia azedarach*), weeping fig (*Ficus bejamina*), edible fig (*Ficus carica*), weeping bottlebrush (*Melaluca viminalis*), carrotwood (*Cupaniopsis anacardioides*), southern magnolia (*Magnolia grandiflora*), and Mexican fan palm (*Washingtonia robusta*).

Landscaping, development, and competitive exclusion from non-native weedy species have limited the potential for native flora to occur within the study area. Common wildlife species observed within the project site included black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), American crow (*Corvus brachyrhynchos*), white-crowned sparrow (*Zonotrichia leucophrys*), and yellow-rumped warbler (*Setophaga coronata*). Wildlife species observed or detected within the project site during the nighttime bat survey was limited to the Mexican free-tailed bat (*Tadarida brasiliensis Mexicana*). The observed bat species was not seen emerging from any of the trees and is not presumed to be roosting within the project site.

Ultimately, the analysis presented in the BRA revealed 38 special-status species with the potential to occur within the biological resource study area for the project site. Of these 38 species, 13 are federally/State listed. However, none of these 13 species are considered to have the potential to occur within the project site. Of the remaining 25 non-listed special-status species, 22 are considered absent due to lack of suitable habitat. The remaining three species are listed below:

- Cooper's hawk (*Accipiter cooperii*)
- Peregrine falcon (*Falco peregrinus anatum*)
- Yuma myotis (*Myotis yumanensis*)

Although there is marginally suitable habitat for these species on site, no remnant nests were observed during the January 13, 2025, field survey, and no records have been recorded within 2 miles of the project site. Therefore, according to the BRA, these three species have a low probability to occur within the project site. Due to the highly disturbed nature of the project site and surrounding development, the BRA anticipates that impacts from the project would have a less than significant effect on threatened, endangered, and non-listed special-status species with adherence to federal and State regulations, as discussed further below.

Nesting Birds. Nesting bird species, including special-status species identified in Appendix B of the BRA, with potential to occur (i.e., burrowing owl and black-tailed gnatcatcher) are protected by California Fish and Game Code Sections 3503, 3503.5, and 3800, and by the Migratory Bird Treaty Act (MBTA) (16 United States Code 703–711). These laws regulate the take, possession, or destruction of the nest or eggs of any migratory bird or bird of prey. However, the USFWS has recently determined that the MBTA should apply only to "…affirmative actions that have as their purpose the taking or killing of migratory birds, their nests,

or their eggs"[25] and will not be applied to incidental take of migratory birds pursuant to otherwise lawful activities.

In compliance with the regulations discussed above, the BRA recommends that any vegetation removal activities occurring under the proposed project be conducted outside the general bird nesting season (February 15 through August 31), as discussed in Regulatory Compliance Measure (RCM) BIO-1. Pursuant to RCM BIO-1, if vegetation is removed under the proposed project during the nesting bird season, a pre-construction nesting bird survey by a qualified biologist is required prior to vegetation removal.

It should be noted that on-site vegetation, including trees, were removed under a separate demolition project, which has already been completed. However, the BRA identified three western sycamore (*Platanus racemosa*) trees which are currently located within an existing median along The City Drive planned for disturbance under the proposed project. As such, the removal of these trees would be subject to RCM BIO-1. Further, in the event that any trees providing nesting bird habitat remain following completion of the separate demolition project and would need to be removed under the proposed project, adherence to RCM BIO-1 would ensure that potential impacts to nesting birds would be less than significant.

Bats. Various regulations afford protections to bats, which are classified as indigenous nongame mammal species, regardless of their status under the California or federal Endangered Species Acts. These regulations include Title 14, Section 251.1 of the California Code of Regulations and California Fish and Game Code Section 4150. In addition, impacts to bat maternity colonies, which are considered native wildlife nursery sites, can be considered potentially significant under CEQA. While Figure 5 of the BRA prepared for the proposed project identifies trees with potential roosting bat habitat, these trees have since been removed and are no longer present on the project site. As such, no potentially suitable habitat for roosting bats remains on site, and no bat protection measures are necessary under the proposed project.

Given the urbanized nature of the project site, the lack of suitable habitat for most special-status species, and the low probability for special-status species to be present on the project site, and with incorporation of RCM BIO-1, potential impacts of the proposed project to special-status species would be less than significant. No project-specific mitigation is required.

[25] 50 Code of Federal Regulations Section 10.14.

Regulatory Compliance Measure:

RCM BIO-1 **Migratory Bird Treaty Act.** In order to avoid potential impacts to nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, vegetation clearing or construction activities that impact or encroach upon existing vegetation shall be conducted outside the general bird nesting season (February 15 through August 31). If construction occurs during the nesting season, a preconstruction nesting bird survey shall be conducted by a qualified biologist within 3 days prior to vegetation removal or at the beginning of construction activities. If a nest with eggs or young of any species covered under the MBTA or the California Fish and Game Code is found, work shall not be permitted within a buffer distance to be determined by the qualified biologist involved. Commencing project construction activities, including vegetation clearing, outside of the primary nesting season for birds reduces the need for preconstruction nesting bird surveys.

Question 4.8 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?

Response to Question 4.8 b):

No Impact. In accordance with Section 1602 of the California Fish and Game Code, the California Department of Fish and Wildlife (CDFW) asserts jurisdiction over rivers, streams, and lakes, as well as any riparian vegetation associated with those features.

As stated in the Response to Question 4.8 a), above, except for portions of the project site containing ornamental landscaping, the project site has been previously developed and is highly disturbed. According to the BRA, no riparian habitat or special-status natural communities are present within the biological resources study area for the proposed project. Therefore, construction and operation of the proposed project would not have the potential to adversely impact any riparian habitat or other sensitive natural communities. No impact would occur, and no mitigation is required.

Question 4.8 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?

Response to Question 4.8 c):

No Impact. The United States Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetland and non-wetland bodies of water that meet specific criteria.

As previously stated, the project site has been previously developed and is within a highly urbanized area. According to the BRA, no potential jurisdictional waters regulated pursuant to the Clean Water Act by the USACE or the Regional Water Quality Control Board, and no lake, rivers, or streambeds regulated pursuant to the California Fish and Game Code by the CDFW are present within the biological resource study area of the proposed project. Therefore, the proposed project would have no impact on federally protected wetlands, and no mitigation is required.

Question 4.8 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?

Response to Question 4.8 d):

Less than Significant Impact. Wildlife movement and habitat fragmentation are important issues in assessing effects to wildlife. Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas such that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another. An example is the fragmentation of habitats within and around "checkerboard" residential development. Habitat fragmentation can also occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning.

The project site does not lie within a designated wildlife corridor and is generally surrounded by industrial/institutional/commercial uses. While the Santa Ana River and associated open space area is located to the east of the project site, the proposed project would not interfere with regional wildlife movement associated with this open space. As such, potential impacts of the proposed project would be less than significant, and no mitigation is required.

Question 4.8 e): Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Response to Question 4.8 e):

Less than Significant Impact. City and County general plans and development ordinances may include regulations or policies governing biological resources. For example, policies may require tree preservation or designate local species survey areas, species of interest, or significant ecological areas.

According to the BRA, under the City's Tree Preservation Ordinance, a permit must be granted by the Director of Community Services prior to the removal of any trees or historical trees. Although three western sycamore (*Platanus racemosa*) trees were identified within the median of The City Drive South where off-site improvements are proposed under the project, none of these trees are within undeveloped or public interest property as defined in Section 12.32.040 and 12.32.050. Therefore, a tree removal permit under the City's Tree Ordinance 12.32 is not required.

Under the City's Street Trees Ordinance, no person shall plant or remove any tree or shrub, stakes, or tree guards in or upon any public streets or right-of-way without having first obtained a permit as required by this ordinance. A permit, as defined in Section 12.28.020 of the City's Street Tree Ordinance, would be required for the removal of the three western sycamore trees identified within the median of The City Drive South within the project site.

Adherence to RCM BIO-2 would ensure that the proposed project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no project-specific mitigation is required.

Regulatory Compliance Measure:

RCM BIO-2 **Street Tree Permit.** Consistent with Section 12.28.020 of the City of Orange Municipal Code, a Street Tree Permit application shall be required and submitted to the City Director of Public Works/City Engineer prior to removal of the three western sycamore trees identified within the median of The City Drive South. The application, as a whole, shall be reviewed and approved by the Public Works Director or City Engineer. The Construction Contractor shall adhere to any instructions provided by the Public Works Director, or City Engineer, regarding Street Trees.

Question 4.8 f): Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Response to Question 4.8 f):

No Impact. The Natural Communities Conservation Planning Act was enacted to encourage broad-based planning to provide for effective protection and conservation of the State's wildlife resources while continuing to allow appropriate development and growth.[26] Natural Community Conservation Plans (NCCPs) may be implemented that identify measures necessary to conserve and manage natural biological diversity within the planning area, while allowing compatible and appropriate economic development, growth, and other human uses. The County, in conjunction with State and federal resource agencies, local jurisdictions, utility companies, the Transportation Corridor Agencies (TCA), and major private landowners, prepared the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) for the County of Orange Central-Coastal Subregion. The NCCP/HCP was approved, followed by execution of an Implementation Agreement, in 1996. The NCCP/HCP aims to conserve natural communities whose numbers have declined while accommodating compatible land uses.

Figure NR-3 of the City's General Plan Natural Resources Element illustrates the location of NCCP Reserve areas relative to the City's boundaries. As shown in Figure NR-3, land included within the NCCP/HCP habitat reserve is located along the City's eastern boundary, while the project site is located toward the City's western boundary. As such, there is a substantial distance from the project site to any NCCP/HCP reserves, and the proposed project would not have the potential to affect this land or any species within. Further, the NCCP is largely concerned with "target species" for long-term protection, none of which are present within the project site.

The proposed project does not include vegetation removal activities with the potential to adversely impact "target species" under the NCCP. Because of this, and because the project site is not located within a NCCP/HCP Reserve area, the proposed project would have no impacts pertaining to conflicts with an adopted NCCP or other plans, and no mitigation is required.

[26] California Research Bureau. 2021. Natural Community Conservation Planning (NCCP). March. Website: https://wildlife.ca.gov/Conservation/Planning/NCCP (accessed January 17, 2025).

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4.9 *Cultural Resources*

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

The following analysis is based upon information presented in the Archaeological Survey Report prepared for the proposed project in February 2025, included as Appendix C to this IS/MND. It should be noted that the field survey was conducted and the Archaeological Survey Report was prepared prior to the demolition of the animal shelter structures and the removal of vegetation that previously existed on the project site. Demolition took place in April and May 2025. Therefore, although photographs in the Archaeological Survey Report include on-site structures and vegetation, these features are no longer present. For purposes of the environmental analysis in this IS/MND the existing condition of the project site is a vacant disturbed lot.

Question 4.9 a): Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Response to Question 4.9 a):

No Impact. Enacted in 1966, the National Historic Preservation Act established the National Register of Historic Places (National Register) program under the authority of the Secretary of the Interior. The National Register is managed by the National Park Service and serves as the nation's official list of historic and cultural resources. On the state level, the Office of Historic Preservation, a division of the California Department of Parks and Recreation, administers the California Register of Historical Resources (California Register), which was established to serve as an authoritative guide to the State's significant historical and archaeological resources.

The project site is currently a vacant disturbed lot and there are no historically significant structures on site. As such, the proposed project would not have the potential to cause a substantial adverse change in the significance of a historical resource. No impact would occur, and no mitigation is required.

Question 4.9 b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Response to Question 4.9 b):

Less than Significant with Mitigation Incorporated. The County is within the San Diego sub-region of the southern coast archaeological region of California.[27] It is likely that soils underlying the project site would have been disturbed previously as part of the development of former land uses. Analysis indicates that the project site contains surficial deposits that likely include Artificial Fill. Artificial Fill is typically not anticipated to include significant archaeological resources.

The proposed project would involve various ground disturbance activities, including the removal of below-grade infrastructure that remains following the conclusion of the separate demolition project that occurred within the project site. This removal would include, but is not limited to, tree stumps, footings, utilities, and pavement. Following this removal, installation of new infrastructure would also involve ground disturbance. Excavation activities associated with the proposed project would reach a depth of 16 feet below ground surface (bgs) at the deepest point of excavation.

To identify any potentially present archaeological resources within the project site and its immediate vicinity, a records search was conducted at the South Central Coastal Information Center of the California Historical Resources Information System (CHRIS) at California State University, Fullerton on January 13, 2025. As discussed in the Archaeological Survey Report, the records search did not identify the presence of any previously documented archaeological resources within the project site or its immediate vicinity. In addition, a pedestrian field survey to identify and document any visible archaeological resources was conducted on February 5, 2025. No cultural materials were observed during the pedestrian field survey.

Based on the results of the record search and pedestrian field survey, it was determined that the project site has limited potential to yield archaeological resources, and no further archaeological work was recommended under the proposed project. However, as the proposed project would include ground disturbance in the form of excavation and grading, there is potential for inadvertent discovery of previously unrecorded resources. Mitigation Measure (MM) CUL-1 sets forth procedures to follow in the event of an inadvertent archaeological discovery. Incorporation of MM CUL-1 would reduce any potential impacts to archaeological resources to a less than significant level.

Mitigation Measure:

MM CUL-1 **Inadvertent Archaeological Discoveries.** In the event that any cultural resources are encountered during earthmoving activities, all work within 50 feet of the find shall be halted until a qualified archaeologist can evaluate the findings and make recommendations. The archaeologist shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify avoidance or other measures as appropriate. If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within the immediate area of the discovery shall be redirected and the find shall be evaluated for significance by a qualified

[27] City of Orange. 2010a. City of Orange General Plan Program Environmental Impact Report. March. Website: https://www.cityoforange.org/home/showpublisheddocument/240/637698173340500000 (accessed January 14, 2025).

archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983).

Question 4.9 c): Disturb any human remains, including those interred outside of dedicated cemeteries?

Response to Question 4.9 c):

Less than Significant Impact. No known human remains are present within the project site, and there are no facts or evidence to support the idea that Native Americans or people of European descent are buried within the project site or its vicinity. However, as described previously, buried and undiscovered archaeological remains, including human remains, have the potential to be present below the ground surface in portions of the project site. Disturbing human remains could violate the State's Health and Safety Code, as well as destroy the resource. In the unlikely event that human remains are encountered during grading activities associated with the proposed project, the proper authorities would be notified, and standard procedures for the respectful handling of human remains during the earthmoving activities would be adhered to. Construction contractors are required to adhere to California Code of Regulations (CCR) Section 15064.5(e), Public Resources Code (PRC) Section 5097, and Section 7050.5 of the State's Health and Safety Code. To ensure proper treatment of remains in the event of an unanticipated discovery of a burial, human bone, or suspected human bone, State law requires that all excavation or grading in the vicinity of the find halt immediately, the area of the find be protected, and the contractor immediately notify the County Coroner of the find. Compliance with these provisions, as specified in Regulatory Compliance Measure (RCM) CUL-1 below, would ensure that any potential impacts to unknown buried human remains would be less than significant by ensuring appropriate examination, treatment, and protection of human remains as required by State law. As such, no project-specific mitigation is required.

Regulatory Compliance Measure:

RCM CUL-1 **Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the Orange County Public Works Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

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4.10 *Energy*

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

Electricity Background. The project site is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile (sq mi) area of Central, Coastal, and Southern California.[28] According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870 gigawatt hours (GWh) (31,604 GWh for the residential sector and 54,266 GWh for the non-residential sector). Total electricity consumption in the County in 2022 was 20,244 GWh (20,243,721,856 kilowatt hours [kWh]).[29]

Natural Gas Background. The Southern California Gas Company (SoCalGas) is the natural gas service provider for the project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000 sq mi service area throughout Central and Southern California, from Visalia to the Mexican border.[30] According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (2,230 million therms for the residential sector). Total natural gas consumption in the County in 2022 was 572 million therms (572,454,744 therms).[31]

Fuel Usage Background. Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. In 2022, total gasoline consumption in California was 316.425 million barrels or 1,597.6 trillion British thermal units (BTU).[32] Of the total gasoline consumption, 299.304 million barrels or 1,511.2 trillion BTU were consumed for

[28] Southern California Edison (SCE). 2020a. About Us. Website: https://www.sce.com/about-us/who-we-are (accessed March 3, 2025).

[29] CEC. 2022a. Electricity Consumption by County and Entity. Websites: http: http://www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed March 12, 2025).

[30] Southern California Gas Company (SoCalGas). 2020b. About SoCalGas. Website: https://www3.socalgas.com/about-us/company-profile (accessed March 12, 2025).

[31] CEC. 2022b. Gas Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx and http://www.ecdms.energy.ca.gov/gasbyutil.aspx (accessed March 12, 2025).

[32] United States Energy Information Administration (EIA). 2022. California State Profile and Energy Estimates, Data. Website: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed March 12, 2025).

transportation.[33] Based on fuel consumption data obtained from CARB's California Emissions Factor Model, Version 2021 (EMFAC2021), vehicle trips are anticipated to consume approximately 1.2 billion gallons of gasoline and approximately 157.1 million gallons of diesel in the County in 2025.

Question 4.10 a): Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Response to Question 4.10 a):

Less than Significant Impact. The proposed project would increase the demand for electricity, natural gas, and fuel usage when compared to existing site conditions, which consist of a vacant disturbed lot. The discussion and analysis provided below is based on the data included in the CalEEMod output, which is included in Appendix A.

Construction-Period Energy Use. Project construction is estimated to begin in the summer of 2026 and would last approximately 19 months, concluding in early 2028. The proposed project would require demolition, site preparation, grading, building construction, utilities/trenching, paving, and architectural coating during construction. However, demolition activities would be limited to only building foundations and pavement.

Construction activities would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and development of the project limits. All or most of this energy would be derived from non-renewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction of the proposed project would not involve the consumption of natural gas because none of the construction-related equipment would be powered by natural gas. Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage within the project limits during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be less than significant, and no mitigation is required.

Operational Energy Use. Energy consumed by the proposed project would be associated with electricity, natural gas, and fuel used for vehicle trips associated with the project. Natural gas use in CalEEMod is measured in units of a thousand British thermal units per year; however, this analysis converts the results to natural gas in units of therms. Electricity use in CalEEMod is measured in kilowatt hours (kWh) per year.

The proposed project would result in energy usage associated with gasoline and diesel to fuel project-related trips. Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates in Section 4.21, Transportation, which identifies that the proposed project is anticipated to generate 491 average daily trips. In addition, natural gas would be limited to the culinary kitchen, with the rest of the buildings designed to be all electric, which was included in CalEEMod.

Table 4.10.A shows the estimated potential increased electricity, natural gas, gasoline, and diesel demand associated with the proposed project. The electricity rates are from the CalEEMod analysis, while the

[33] United States Energy Information Administration (EIA). 2022. California State Profile and Energy Estimates, Data. Website: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed March 12, 2025).

gasoline and diesel rates are based on the traffic analysis in conjunction with the United States Department of Transportation fuel efficiency data and using the United States Environmental Protection Agency (EPA) fuel economy estimates for 2023 and the California diesel fuel economy estimates for 2025.

Table 4.10.A: Estimated Annual Energy Use of Proposed Project

	Electricity Use (kWh per year)	Natural Gas Use (kBTU per year)	Gasoline (gallons per year)	Diesel (gallons per year)
Proposed Project	994,786	968	49,644	29,429

Source: Compiled by LSA (May 2025).
kBTU = thousand British thermal units
kWh = kilowatt hours

As shown in Table 4.10.A, the estimated increase in electricity demand associated with the operation of the proposed project would be 994,786 kWh per year. Total electricity consumption in the County in 2022 was 20,243,721,856 kWh; therefore, operation of the proposed project would negligibly increase the annual electricity consumption in the County by approximately less than 0.1 percent.

As shown in Table 4.10.A, the estimated potential increase in natural gas demand associated with the proposed project would be 968 therms per year. Total natural gas consumption in the County in 2022 was 572 million therms (572,454,744 therms). Therefore, operation of the proposed project would negligibly increase the annual natural gas consumption in the County by approximately less than 0.1 percent.

Electricity and natural gas demand associated with project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. In addition, proposed new development would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608). However, energy consumption is largely a function of personal choice and the physical structure and layout of buildings.

In 2018, Senate Bill (SB) 100 was passed, which has committed California to generate all electricity from carbon free sources by 2045. As mentioned above, natural gas would be limited to culinary purposes, with all other buildings designed to be all electric. The proposed project's all-electric design considers the context of the changing electricity grid and is designed to displace natural gas emissions over the lifetime of the project. The all-electric building design would result in decreasing emissions as California's grid becomes cleaner, and once the grid consists of 100 percent renewable generation sources, the project would have zero operational emissions associated with electricity usage.

The proposed project would result in the annual consumption of 49,644 gallons of gasoline and 29,429 gallons of diesel fuel, as shown in Table 4.10.A. This analysis conservatively assumes that all vehicle trips generated as a result of project operation would be new to the County. Based on fuel consumption obtained from EMFAC2021, approximately 1.1 billion gallons of gasoline and approximately 156.7 million gallons of diesel are anticipated to be consumed from vehicle trips in the County in 2028. Therefore,

vehicle trips associated with the proposed project would increase the annual fuel use in the County by approximately less than 0.01 percent for gasoline fuel usage and approximately 0.02 percent for diesel fuel usage. In addition, vehicles associated with trips to and from the project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. As such, it is reasonable to assume that the fuel efficiency of vehicles associated with project operations would not increase throughout the life of the proposed project. Therefore, implementation of the proposed project would not result in a substantial increase in transportation-related energy uses.

The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be less than significant, and no mitigation is required.

Question 4.10 b): Conflict or obstruct a state or local plan for renewable energy or energy efficiency?

Response to Question 4.10 b):

Less than Significant Impact. In 2002, the California Legislature passed Senate Bill (SB) 1389, which required the CEC to prepare the *Integrated Energy Policy Report* every two years with policy recommendations for addressing the State's energy problems. Policy recommendation include calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC adopted the *2024 Integrated Energy Policy Report Update*[34] in February 2024. The *2024 Integrated Energy Policy Report Update* provides the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to overall use in the County. In addition, energy usage associated with proposed project operations would be relatively small in comparison to the overall use in the County and the State's available energy sources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as demonstrated above, the proposed project would not result in the inefficient, wasteful, and unnecessary consumption of energy. Potential impacts related to conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less than significant, and no mitigation is required.

[34] CEC. 2024. 2024 Integrated Energy Policy Report Update. Docket No. 24-IEPR-01.

4.11 *Geology and Soils*

Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐

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 waste water disposal system where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The analysis presented in this section is based upon information presented in the *Preliminary Geotechnical Report Workforce Reentry Center 561 The City Drive South* (Preliminary Geotechnical Report) prepared for the proposed project by Ninyo & Moore in June 2024, the *Geotechnical Exploration Report Proposed Workforce Reentry Center 591 The City Drive South City of Orange, California* (Geotechnical Exploration Report) prepared for the proposed project by Verdantas Inc. in August 2024, and the *Paleontological Resources Memorandum for the Workforce Reentry Project* (Paleontological Resources Memorandum) prepared for the proposed project by LSA in March 2025. The geotechnical reports, collectively, are included as Appendix D to this IS/MND in the order they appear above. The Paleontological Resources Memorandum is included as Appendix E to this IS/MND. It should be noted that the Preliminary Geotechnical Report and the Geotechnical Exploration Report were prepared prior to the demolition of the animal shelter structures and the removal of vegetation that previously existed on the project site. Demolition occurred in April and May 2025. Therefore, although existing conditions presented in these reports describe the animal shelter structures and vegetation, these features are no longer present. For purposes of the environmental analysis in this IS/MND the existing condition of the project site is a vacant disturbed lot.

Question 4.11 a): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

Question 4.11 a-*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.

Response to Question 4.11 a-*i*):

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 establishes regulatory zones surrounding surface traces of active faults within California in order to reduce losses

from surface fault rupture.[35] In compliance with the Alquist-Priolo Earthquake Fault Zoning Act, Alquist-Priolo earthquake fault zones are periodically mapped by the California Geological Survey, a division of the California Department of Conservation (DOC).

According to the Preliminary Geotechnical Report and the Geotechnical Exploration Report, the project site is not located within a currently established Alquist-Priolo Earthquake Fault Zone, and no active faults have been mapped in proximity to the project site. As such, the potential for surface fault rupture within or in the vicinity of the project site is considered low, and the proposed project would not directly or indirectly cause potential substantial adverse effects related to rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation is required.

Question 4.11 a-*ii*): Strong seismic ground shaking?

Response to Question 4.11 a-*ii*):

Less than Significant with Mitigation Incorporated. Ground shaking due to seismic events (earthquakes) would typically be considered the greatest source of potential damage to structures. Seismic shaking is characterized by the physical movement of the land surface during and subsequent to an earthquake. Seismic shaking has the potential to cause destruction and damage to buildings and property, including damage resulting from damaged or destroyed gas or electrical utility lines; blockage of surface seepage and groundwater flow; changes in groundwater flow; dislocation of street alignments; displacement of drainage channels and drains; and possible loss of life.

As discussed above in Response to Question 4.11 a-*i*), no active faults are located within or near the project site. However, the project site is located within Southern California, which contains various active and inactive faults and is generally considered a seismically active region. According to the United States Geological Survey (USGS) Earthquake Hazards Program National Seismic Hazard Map, the closest active fault to the project site is the Newport-Inglewood fault, located approximately 9.3 miles away, followed by the Elsinore fault, located approximately 10.2 miles away. While the proposed project could be affected by strong seismic ground shaking originating from a nearby fault, the intensity of ground shaking would depend upon several factors, including but limited to, distance from the fault, earthquake magnitude, and site characteristics. The Geotechnical Exploration Report lists various design parameters set forth by the 2022 CBC that would reduce potential risks associated with seismic shaking. Further, Section 3.0 of the Geotechnical Exploration Report contains various recommendations for inclusion in project design and construction to ensure that development of the project site is feasible from a geotechnical standpoint. Under Mitigation Measure (MM) GEO-1, the proposed project would be required to comply with the recommendations set forth in the Geotechnical Exploration Report. Therefore, the proposed project's compliance with the regulatory requirements set forth in the 2022 CBC and the Geotechnical Exploration Report would ensure that the proposed project would not directly or indirectly cause potential substantial adverse effects related to strong seismic ground shaking. Impacts would be less than significant with mitigation incorporated.

[35] California Department of Conservation (DOC). n.d. Alquist-Priolo Earthquake Fault Zones. Website: https://www.conservation.ca.gov/cgs/alquist-priolo (accessed January 9, 2025).

Mitigation Measure:

MM GEO-1 **Compliance with the Recommendations in the Geotechnical Exploration Report.** Prior to the issuance of grading permits, the Director of the Orange County Public Works Department, or their designee, shall verify that requirements and recommendations in the Geotechnical Exploration Report have been appropriately incorporated into the project plans. All grading operations and construction shall be conducted in conformance with all of the recommendations included in the Geotechnical Exploration Report, which was prepared by Verdantas Inc., titled *Geotechnical Exploration Report Proposed Workforce Reentry Center 591 The City Drive South City of Orange, California* (Geotechnical Exploration Report) (August 7, 2024) as well as any subsequent geotechnical reports prepared for the proposed project. All recommendations found in the Geotechnical Exploration Report shall be incorporated into project design and shall include, but not be limited to:

- Site grading recommendations;
- Ground improvement recommendations;
- Foundation design recommendations;
- Flagpole footing recommendations;
- Cement type and corrosion protection recommendations;
- Retaining wall recommendations;
- Paving recommendations;
- Infiltration BMP design recommendations;
- Temporary excavation recommendations;
- Trench backfill recommendations; and
- Drainage and landscaping recommendations.

Additional site construction plans, including grading plans, shall be reviewed by the project Geotechnical Consultant prior to construction to check for conformance with all of the recommendations of the Geotechnical Exploration Report. Design, grading, and construction shall be performed in accordance with the requirements of the applicable seismic standards identified in the Geotechnical Exploration Report, as well as the recommendations of the project Geotechnical Consultant as summarized in the Geotechnical Exploration Report, which is subject to review by the Director of the Orange County Public Works Department, or their designee, prior to the start of grading activities.

Question 4.11 a-*iii*): Seismic-related ground failure, including liquefaction?

Response to Question 4.11 a-*iii*):

Less than Significant Impact. Liquefaction is caused by sudden temporary increases in pore water pressure due to seismic densification or other displacement of submerged granular soils. Layers of loose sand and sandy silt may, therefore, be subject to liquefaction if these materials are or were to become submerged and are also exposed to strong seismic ground shaking. Seismic ground shaking of relatively loose granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. This loss of support can produce local ground failure such as settlement or lateral spreading that may damage overlying improvements. Liquefaction commonly occurs when three

conditions are present simultaneously: (1) high groundwater; (2) relatively loose, cohesion-lacking, primarily sandy soil; and (3) earthquake-generated seismic waves.

According to Figure PS-1, Environmental and Natural Hazard Policy Map, of the City's General Plan Public Safety Element,[36] the City considers the project site to be located within a Liquefaction Hazard Area. In addition, according to the Geotechnical Exploration Report, the CGS Seismic Hazard Zones map for the Anaheim and Newport Beach Quadrangles indicates that the project site is located in a liquefaction-susceptible area.

Historically, the shallowest depth to groundwater at the project site has been recorded as between 25 and 30 feet bgs. Using this information and a Maximum Considered Earthquake (MCE) scenario, modeling presented in the Geotechnical Exploration Report indicates that the potential for liquefaction to occur within the project site in the event of an earthquake is low, with little to no expression at ground surface. As such, the proposed project would not directly or indirectly cause potential substantial adverse effects related to seismic-related ground failure, including liquefaction. Impacts would be less than significant, and no mitigation is required.

Question 4.11 a-*iv*): Landslides?

Response to Question 4.11 a-*iv*):

Less than Significant Impact. The project site is generally flat and slopes approximately 0.5 percent to 3 percent, slightly, to the southwest. According to Figure PS-1, Environmental and Natural Hazard Policy Map, of the City's General Plan Public Safety Element,[37] the project site is not located within an area identified as a Landslide Hazard Area. As stated in the Geotechnical Exploration Report, the CGS has not mapped the project site as being located within a landslide hazard zone. Further, no known landslides have occurred within the project site or its vicinity. As such, the proposed project would not directly or indirectly cause potential substantial adverse effects related to landslides. Impacts would be less than significant, and no mitigation is required.

Question 4.11 b): Result in substantial soil erosion or the loss of topsoil?

Response to Question 4.11 b):

Less than Significant Impact. The primary concern in regard to soil erosion or loss of topsoil would be during the construction phase of the proposed project. Grading and earthwork activities associated with proposed construction activities could temporarily expose soils to potential short-term erosion by wind and water. However, because the project site is relatively flat, potential soil erosion can be controlled via implementation of standard construction erosion control practices such as the use of water to prevent fugitive dust and other construction best management practices (BMPs) required pursuant to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Because the project site surfaces would not be prone to erosion with implementation of erosion control practices, the proposed project would not result in substantial soil erosion or the loss of topsoil. Furthermore, the exposure of

[36] City of Orange. 2015a. General Plan Public Safety Element. Website: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000 (accessed January 9, 2025).

[37] Ibid.

soils during construction would be short-term and subject to requirements established by the NPDES, which is discussed further in Section 4.14, Hydrology and Water Quality, of this IS/MND.

Once operational, the proposed project would increase the proportion of impervious surface area within the project site. As such, the proposed project would potentially result in increased peak flow runoff and volumes as compared to existing conditions. However, the project design would include a new underground retention/detention system that would be capable of reducing 2-year, 24-hour storm peak flows to zero. As such, the potential for erosion or the loss of topsoil under the proposed project would be reduced to less than or equal to existing conditions. Nevertheless, incorporation of Regulatory Compliance Measures (RCM) HYD-1 through RCM HYD-4, as discussed further in Section 4.14, would minimize the volume of runoff within the project site that could potentially contribute to erosion. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects related to soil erosion or loss of topsoil. Impacts would be less than significant, and no mitigation is required.

Question 4.11 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?

Response to Question 4.11 c):

Less than Significant Impact with Mitigation Incorporated.

***Landslides*.** As previously stated, because the project site is located in a relatively flat area with no significant slopes nearby, landslides or other forms of natural slope instability do not represent a significant hazard to the project site. Further, the City's General Plan Public Safety Element and CGS mapping indicates that the project site is not located in a landslide hazard area. As such, the risk of on- or off-site landslides under the proposed project would be less than significant, and no mitigation is required.

Subsidence. Subsidence refers to vertical displacement of land. Common causes of land subsidence are pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (sinkholes); collapse of underground mines; drainage of organic soils; and initial wetting of dry soils (hydro compaction). Subsidence is also caused by heavy loads generated by large earthmoving equipment. The project site is not located within an area of known large-scale groundwater, peat loss, or oil extraction. While two Orange County Water District (OCWD) groundwater monitoring wells are present on the project site, these wells are used for monitoring purposes rather than large-scale extraction. Further, these wells would be removed from the project site by OCWD independently of the proposed project.

According to the USGS Areas of Land Subsidence in California, the project site, as well as most of the northern portion of the County, is documented as an area of land subsidence associated with groundwater pumping.[38] Subsidence related to groundwater pumping typically occurs in small magnitudes spread out over large areas, therefore minimizing impacts to individual sites. Because the proposed project consists of discrete structures on a singular project site rather than a regionally extensive structure, subsidence-related elevation changes would not be expected to damage the proposed buildings. As such, the risk of

[38] United States Geologic Survey (USGS). n.d.-a. Areas of Land Subsidence in California. Website: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html (accessed January 10, 2025).

on- or off-site subsidence-related adverse effects under the proposed project is less than significant, and no mitigation is required.

Liquefaction. As previously stated, both the City's General Plan Public Safety Element and the CGS Seismic Hazard Zones map for the Anaheim and Newport Beach Quadrangles indicates that the project site is located in a liquefaction-susceptible area. However, modeling conducted as part of the Geotechnical Exploration Report indicated that the potential for liquefaction to occur within the project site under a MCE scenario is low, with little to no expression at ground surface. As such, the risk of on- or off-site liquefaction under the proposed project would be less than significant, and no mitigation is required.

Lateral Spreading. Lateral spreading often occurs on very gentle slopes or flat terrain. This ground failure is caused by liquefaction and is usually triggered by rapid ground motion, such as that experienced during an earthquake, but can also be artificially induced. When coherent material, either bedrock or soil, rests on materials that liquefy, the upper units may undergo fracturing and extension and may then subside, translate, rotate, disintegrate, or liquefy and flow.

Preparation of the Geotechnical Exploration Report involved subsurface exploration, including cone penetration test (CPT) soundings up to depths of 50 feet bgs. A lateral deformation analysis was then performed for all of the CPTs in order to analyze lateral spreading risks within the project site. Based on the results of this analysis, the risk of seismically-induced lateral displacement and/or spreading is anticipated to be negligible. As such, the proposed project would not potentially result in onsite or offsite lateral spreading, and impacts would be less than significant. No mitigation is required.

Collapse. The Geotechnical Exploration Report does not identify collapse as a potential hazard to the project site. Nevertheless, as discussed above, the proposed project would adhere to all feasible design measures identified in the Geotechnical Investigation to increase the stability of the proposed structures, foundations, and underlying soils, pursuant to MM GEO-1. As such, the risk of collapse under the proposed project would be less than significant with mitigation incorporated.

Summary. In summary, based on compliance with the 2022 CBC and implementation of design recommendations set forth in the Geotechnical Exploration Report pursuant to MM GEO-1, potential impacts of the proposed project related to unstable soils or geologic units that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be reduced to a less than significant level.

Question 4.11 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?

Response to Question 4.11 d):

Less than Significant with Mitigation Incorporated. Expansive soils are characterized by their ability to undergo substantial volume changes (shrink or swell) due to variations in moisture content as a result of precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors. Expansive soils contain types of clay minerals that occupy considerably more volume when they are wet or hydrated than when they are dry or dehydrated. Volume changes associated with changes in the moisture content of near-surface expansive soils can cause uplift or heave of the ground when they become wet or, less commonly, cause settlement when they dry out.

During preparation of the Geotechnical Exploration Report prepared for the proposed project, a near-surface soil sample obtained during subsurface exploration was tested for expansion potential. The results of this testing indicated that the soil had an Expansion Index (EI) value of 1, which is considered "very low" potential for expansion. However, because only one soil sample was tested and because soils on site are expected to vary, the Geotechnical Exploration Report recommends additional testing upon completion of site grading and excavation in order to confirm the results of the initial testing. As described in MM GEO-1, the proposed project is required to incorporate all recommendations provided in the Geotechnical Exploration Report and would therefore complete the additional testing as recommended. The Geotechnical Exploration Report also recommends that if the imported fill material is required during grading activities associated with the proposed project, the imported soils shall have an EI of 20 or less, which is still considered "very low." As previously stated, the proposed project would involve importation of approximately 2,000 cy of soil. As described in the Geotechnical Exploration Report, the proposed project would only import soils with an EI of 20 or less. Therefore, based on the results of the initial testing and given the proposed project's compliance with the recommendations for additional expansive soil testing presented in the Geotechnical Exploration Report, and pursuant to implementation of MM GEO-1, the proposed project would not create substantial direct or indirect risks to life or property associated with expansive soils. Impacts would be less than significant with mitigation incorporated.

Question 4.11 e): Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal system where sewers are not available for the disposal of waste water?

Response to Question 4.11 e):

No Impact. The proposed project would not use septic tanks or alternative methods for disposal of wastewater into subsurface soils. The entirety of the City, as well as the project site, are currently served by an existing sewer system; as such, there is no need for septic tanks or other alternative wastewater systems. The proposed project would include one or more new 4-inch sewer laterals to be extended as needed from the existing mainline sewer system. Therefore, the proposed project would not result in any impacts related to septic tanks or alternative wastewater disposal methods. No mitigation is required.

Question 4.11 f): Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Response to Question 4.11 f):

Less than Significant With Mitigation Incorporated. The County has mapped general areas of paleontological sensitivity, based on known sites and underlying geological formations, within Figure VI-9 of its General Plan Resources Element.[39] According to Figure VI-9, the project site is not located within an area of paleontological sensitivity as identified by the County. Nevertheless, to evaluate the potential presence of paleontological resources within the project site, a Paleontological Resources Memorandum was prepared for the proposed project in March 2025. Preparation of this assessment included consultation of geologic maps of the project site, review of relevant geological and paleontological literature to determine the geological makeup of the project site and any known fossils in the region, and a search of the Natural History Museum of Los Angeles County (NHMLAC) to determine the status and extent of previously recorded paleontological resources within and surrounding the project site. A

[39] County of Orange. 2012a. Orange County General Plan Resources Element. Website: https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan (accessed January 10, 2025).

pedestrian field survey was also conducted on February 5, 2025, to document and collect any paleontological resources that may have been present on the project site.

According to the fossil locality search conducted by the NHMLAC, the project site does not contain any known fossil localities. Further, no paleontological resources were observed during the February 5, 2025, pedestrian field survey.

According to the Paleontological Resources Memorandum, geologic mapping indicates that the entirety of the project site, including the proposed off-site roadway improvement areas, are underlain by Young Alluvial Fan Deposits. Young Alluvial Fan Deposits are Holocene to late Pleistocene in age (less than 126,000 years ago) and consist of unconsolidated silt, sand, and gravel. Only fossils from the middle to early Holocene, or approximately 4,200 to 11,700 years ago, are considered paleontologically important. In addition, the older Pleistocene deposits underlying these Holocene deposits have been known to produce paleontologically important fossils, particularly below a depth of 10 feet. As such, Young Alluvial Fan Deposits are assigned a low paleontological sensitivity above a depth of 10 feet bgs and a high paleontological sensitivity beyond a depth of 10 feet bgs. Because excavation activities associated with the proposed project are anticipated to reach up to 16 feet bgs at the deepest point of excavation, the proposed project may have the potential to disturb soils with a high paleontological sensitivity. Therefore, to ensure that potential impacts to previously undiscovered paleontological resources remain less than significant, preparation of a Paleontological Resources Impacts Mitigation Program (PRIMP), paleontological monitoring of construction activities, appropriate treatment of newly discovered resources, and preparation of a final paleontological monitoring report would be required, as outlined in Mitigation Measure (MM) GEO-2 below.

In addition to the Young Alluvial Fan Deposits, given prior development that has occurred on the project site, the Paleontological Resources Memorandum notes that Artificial Fill is also likely to be present. Artificial Fill consists of sediments that have been manually transported from one location to another, meaning that any fossils contained in these soils have been removed from their paleontological context. As such, Artificial Fill is considered to have no paleontological sensitivity.

Based on the analysis presented above, and with adherence to MM GEO-2, potential impacts of the proposed project to undiscovered paleontological resources would be less than significant.

Mitigation Measure:

MM GEO-2 **Paleontological Resources.** Prior to the commencement of ground-disturbing activities, a qualified, professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology (SVP) shall be retained to develop a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall be consistent with the guidelines of the SVP and shall include the methods that will be used to protect paleontological resources that may exist within the project limits, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of ground disturbance.

If ground-disturbing activities occur in deposits with high paleontological sensitivity (i.e., Young Alluvial Fan Deposits below a depth of 10 feet and Old Alluvial Fan Deposits), those activities shall be monitored by a qualified paleontological monitor following the PRIMP. If paleontological resources are encountered during ground disturbance, the

paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find to assess its significance. Once soils have been monitored during the excavation stage and determined to lack the presence of paleontological resources, monitoring of these soils would no longer be necessary for the remainder of grading activities. If paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and the paleontologist or paleontological monitor shall be contacted to assess the find for scientific significance. If determined to be scientifically significant, the fossil shall be collected from the field.

Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a museum repository. At the conclusion of the monitoring program, a report of findings shall be prepared and submitted to the Director of the County's Public Works Department, or their designee, to document the results of the monitoring program.

4.12 *Greenhouse Gas Emissions*

Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?		☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Greenhouse Gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or form from secondary reactions taking place in the atmosphere. Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although manmade GHGs include naturally occurring GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), some gases like hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF_3), and sulfur hexafluoride (SF_6) are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

State CEQA Guidelines Section 15064(b) provides that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting." Currently, there is no Statewide GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Threshold methodology and thresholds are currently developed and revised by air districts in California.

To provide guidance to local lead agencies on determining significance for GHG emissions in their California Environmental Quality Act (CEQA) documents, the South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group (Working Group). The Working Group has identified a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1.** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.

- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

- **Tier 3.** If GHG emissions are less than the screening-level threshold, project-level and cumulative GHG emissions are less than significant.

  For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening-level threshold of 3,000 metric tons (MT) of CO_2e (or MT CO_2e) per year (MT CO_2e/year) for all land use types or, under Option 2, the following land use-specific thresholds: 1,400 MT CO_2e for commercial projects; 3,500 MT CO_2e for residential projects; or 3,000 MT CO_2e for mixed-use projects. This bright-line threshold is based on a review of the Office of Planning and Research (OPR) database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

- **Tier 4.** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. The SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per-capita efficiency targets. The SCAQMD is not recommending use of a percentage emissions reduction target. Instead, the SCAQMD proposed a 2020 efficiency target of 4.8 MT CO_2e/year per service population for project-level analyses and 6.6 MT CO_2e/year per service population for plan-level projects (e.g., program-level projects such as General Plans).

- For the purpose of this analysis, the proposed project will be compared to the threshold of 3,000 MT CO_2e/year for all land use types. The project is also evaluated for compliance with the 2022 Scoping Plan and the 2024 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Question 4.12 a): Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?

Response to Question 4.12 a):

Less than Significant Impact. This section describes the proposed project's construction- and operation-related GHG emissions and contribution to global climate change. The SCAQMD has not addressed

emission thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction Greenhouse Gas Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD suggests that construction GHG emissions be amortized over the life of the project (defined as 30 years), added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Using CalEEMod, it is estimated that the proposed project would generate a total of approximately 1,400.7 MT CO_2e during construction of the project. When annualized over the 30-year life of the project, annual emissions would be 46.69 MT CO_2e.

Operational Greenhouse Gas Emissions. Long-term operation of the proposed project would generate GHG emissions from area, mobile, waste, and water sources, as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the proposed project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site and other sources. Waste-source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water-source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

GHG emissions were estimated using CalEEMod. Table 4.12.A shows the estimated operational GHG emissions for the proposed project. Mobile emissions would be the largest source of GHG emissions for the project, at approximately 59 percent of the project total. Energy sources would be the next largest category, at approximately 32 percent. Waste and water sources would be about 6 percent and 3 percent of the total emissions, respectively.

As discussed above, the project would have less than significant GHG emissions if it would result in operational GHG emissions of less than the SCAQMD threshold of 3,000 MT CO_2e per year. Based on the analysis results, when the amortized annual construction emissions are added to the annual operation emissions, the proposed project is anticipated to generate approximately 823.9 MT CO_2e per year, which is well below the SCAQMD's 3,000 MT CO_2e per year threshold. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment. Impacts would be less than significant, and no mitigation is required.

Table 4.12.A: Greenhouse Gas Emissions

Emission Type	Operational Emissions (MT/yr)				
	CO2	CH4	N2O	CO2e	Percentage of Total
Mobile Source	449.7	<0.1	<0.1	456.4	59
Area Source	1.7	<0.1	<0.1	1.7	<1
Energy Source	245.2	<0.1	<0.1	246.1	32
Water Source	18.5	0.3	<0.1	28.1	3
Waste Source	12.8	1.3	0.0	44.9	6
Total Operational Emissions				**777.2**	**100**
Amortized Construction Emissions				46.69	—
Total Annual Emissions				**823.9**	**—**
SCAQMD Threshold				**3,000**	
Exceedance?				**No**	

Source: Compiled by LSA (May 2025).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT/CO_2e = metric tons of carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide
SCAQMD = South Coast Air Quality Management District

Question 4.12 b): Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Response to Question 4.12 b):

Less than Significant Impact. The following discussion evaluates the proposed project according to the goals of the 2022 Scoping Plan, Executive Order (EO) B-30-15, Senate Bill (SB) 32, Assembly Bill (AB) 197, AB 1279, and SCAG's 2024–2050 RTP/SCS.

2022 Scoping Plan. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 affirmed the importance of addressing climate change by codifying into statute the GHG emissions reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. CARB released the 2017 Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32.[40] SB 32 builds on AB 32 and keeps the State on its path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. AB 197, the companion bill to SB 32, provides additional direction to CARB that is related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 that is intended to provide easier public access to air emission data collected by CARB was posted in December 2016. AB 1279 codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter.

The State's 2022 Scoping Plan[41] assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

40 CARB. 2017. California's 2017 Climate Change Scoping Plan. November.
41 CARB. 2022 Scoping Plan for Achieving Carbon Neutrality. December. Website: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf (accessed March 26, 2025).

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California be zero-emission by 2035 and that all other fleets transition to zero-emission as fully as possible by 2045, which would reduce the percentage of fossil fuel combustion vehicles.

- **Energy-efficient measures** are intended to maximize energy-efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would limit the use of natural gas to culinary purposes, with the rest of the buildings designed to be all electric. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and will not have a cumulative considerable impact on climate change.[42] Therefore, the proposed project would help the State remain on track to meeting its carbon neutrality goals. In addition, the proposed project would comply with the latest California Energy Code and CALGreen standards regarding energy conservation and green building standards. Therefore, the proposed project would comply with applicable energy measures.

- **Water conservation and efficiency measures** are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest CALGreen standards, which include a variety of different measures, including reduction of wastewater and water use. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. The proposed project would include water efficient, drought-tolerant landscaping, and low flow fixtures. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

- The goal of **transportation and motor vehicle measures** is to develop regional GHG emission reduction targets for passenger vehicles. As discussed in Section 4.21, Transportation, the proposed project is defined as a public institution providing vocational and housing accommodation for adult individuals involved in the criminal justice system or other County systems of care. Therefore, the proposed project qualifies for project-type screening and is presumed to have a less than significant impact on VMT. In addition, the proposed project would

[42] Bay Area Air Quality Management District (BAAQMD). 2022. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans. April. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/final-ceqa-thresholds-report-for-climate-impacts-02092022-alt-pdf.pdf?rev=a3f6b70f316b4637864fb0b2cff78ebd&sc_lang=vi-vn (accessed March 26, 2025).

incorporate several features designed to support sustainable commuting options, including electric vehicle charging stations, bicycle parking, and employee transportation alternatives. These measures aim to reduce reliance on single-occupancy vehicles and promote the use of sustainable modes of transportation such as carpooling, biking, and electric vehicles. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

Therefore, the proposed project would comply with existing State regulations adopted to achieve the overall GHG emission reduction goals identified in the 2022 Scoping Plan, EO B-30-15, SB 32, AB 197, and AB 1279.

SCAG's 2024-2050 RTP/SCS. SCAG's 2024–2050 RTP/SCS[43] identifies land use strategies that focus on new housing and job growth in areas served by high-quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the region's proposed transportation network. The core vision in the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe for all roadway users, preserve the transportation system, expand transit, and foster development in transit-oriented communities. The 2024–2050 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecasted development pattern that is generally consistent with regional-level General Plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent per capita by 2035 (compared to 2005 levels). The 2024–2050 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2024–2050 RTP/SCS, but it provides incentives for consistency for governments and developers.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. As demonstrated in Section 4.7, Air Quality, the proposed project does not meet the criteria identified in *State CEQA Guidelines* Section 15205.b.2 (Projects of Statewide, Regional, or Areawide Significance) for projects of statewide, regional, or areawide significance. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning, and would be consistent with the City's General Plan and Zoning Ordinance. As such, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15205.b.2 and as such, it would not conflict with the SCAG RTP/SCS targets since those targets were established and are applicable on a regional level.

The proposed project would construct a new workforce reentry center that would include an office/vocational building, a retail/culinary building, and a supportive housing and services building for a total combined building area of 80,364 sf. The proposed project would be consistent with existing local planning assumptions for the project site. Therefore, it is anticipated that implementation of the proposed

[43] Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. April. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839 (accessed March 26, 2025).

project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Impacts would be less than significant, and no mitigation is required.

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4.13 *Hazards and Hazardous Materials*

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

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?	☐	☐	☒	☐

The following analysis is based upon information presented in the following hazardous materials reports prepared for the proposed project by geotechnical consultant Ninyo & Moore:

- Phase I Environmental Site Assessment (ESA), October 2024
- Limited Phase II ESA, March 2025
- Soil Management Plan (SMP), December 2024
- Human Health Risk Assessment Report and Vapor Intrusion Mitigation Recommendation, April 2025

These reports, collectively, are included as Appendix F to this IS/MND in the order they appear above. It should be noted that these reports were prepared prior to the demolition of the animal shelter structures to grade and the removal of vegetation that previously existed on the project site. Demolition occurred in April and May 2025. Therefore, although photographs and analysis presented in these reports include these on-site structures and vegetation, these features are no longer present. For purposes of the environmental analysis in this IS/MND, the existing condition of the project site is a vacant disturbed lot.

Question 4.13 a): Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Response to Question 4.13 a):

Less than Significant Impact. State regulations define "hazardous material" as a substance or combination of substances that may cause or significantly contribute to an increase in serious, irreversible, or incapacitating illness or may pose a substantial presence or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed (22 CCR Section 66261.10). Hazardous materials have the potential to impact public health and the environment, and risk is determined by the probability of exposure and to the inherent toxicity of a material.

Construction. Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances (e.g., oils, fuels) during heavy equipment operation for site excavation, grading and construction. The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing government regulations. The potential for the release of hazardous materials during project construction is low, and even if a release were to occur, it

would not result in a significant hazard to the public, surrounding land uses, or the environment due to the small quantities of these materials associated with construction vehicles.

Operation. The proposed project includes the development of three buildings as well as associated outdoor spaces and surface parking to provide a facility to house adult individuals involved in the criminal justice system or other County systems of care and assist with their transition into the workforce. Project operation would involve the use of potentially hazardous materials (e.g., solvents, cleaning agents, paints, fertilizers, and pesticides) typical of educational and residential land uses that, when used correctly and in compliance with existing laws and regulations, would not result in a significant hazard to people in the vicinity of the proposed project.

While the proposed vocational/office building contains a warehouse component, this space would be used for training purposes only and would not enable any large-scale manufacturing, industrial, or other uses utilizing large amounts of hazardous materials within the project site. As such, program participants and staff are not anticipated to use, store, dispose, or transport large volumes of hazardous materials. Hazardous substances associated with educational and residential land uses are typically limited in both amount and use such that they can be contained without impacting the environment.

Further, OC Waste & Recycling (OCWR) maintains a directory of business hazardous materials and hazardous waste collection companies to assist with the properly disposal of hazardous waste materials.[44] It is anticipated that the proposed project would adhere to such programs, or medical waste collection services, to properly dispose of household hazardous waste. Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials resulting from operation of the proposed project would be less than significant, and no mitigation is required.

Question 4.13 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?

Response to Question 4.13 b):

Less than Significant With Mitigation Incorporated. A Phase I ESA was prepared in October 2024 to evaluate the project site for potential Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), and Historical Recognized Environmental Conditions (HRECs) that may be present, off-site conditions that may impact the subject property, and/or conditions indicative of releases or threatened releases of substances on, at, in, or to the project site. ASTM International defines RECs as "(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment." Similarly, a CREC is a past REC that has been addressed to the satisfaction of the applicable regulatory authority with the use of required controls, while a HREC is a past REC that has been addressed to the satisfaction of the applicable regulatory authority without the use of required controls.

[44] OC Waste and Recycling. n.d. Business Hazardous Waste. Website: https://oclandfills.com/hazardous-waste/business-hazardous-waste-referrals (accessed January 8, 2025).

All hazardous materials testing and reconnaissance performed to evaluate the proposed project were conducted in accordance with the requirements and limitations of the Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E1527 - 21), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E2247 - 16), and the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E1528 - 22).

According to the Phase I ESA, prior to the channelization of the Santa Ana River, the southeastern portion of the project site contained the riverbed. Following channelization of the Santa Ana River, the southwestern portion of the project site was used for agricultural production beginning in 1947. Between 1968 and 1995, a gasoline service station was operational within the project site, and several associated structures were also constructed during this time frame. The gasoline service station structure was demolished in 1995. By 2005, the southeastern portion of the project site had been developed into a grassy recreational area for the adjacent Theo Lacy Facility. The southern portion of the project site was then developed into the Dr. John H. Bower Animal Shelter, which had ceased operations by 2018. The animal shelter structures were demolished in April and May of 2025 under a separate project and the project site is now a vacant disturbed lot.

While the Phase I ESA prepared for the proposed project did not identify any CRECs or HRECs, several RECs were identified within or near the project site. Refer to Table 4.13.A below for an inventory of the RECs determined to be present or likely to be present on site. In March 2025, a Limited Phase II ESA was prepared by the same geotechnical consultant to provide an in-depth analysis of the specific RECs identified in the Phase I ESA. Preparation of the Limited Phase II ESA involved drilling, soil screening and sampling, laboratory analysis, and soil vapor probe installation and sampling. Table 4.13.A also contains the determination reached in the Limited Phase II ESA regarding each REC and its potential to present a hazard to the proposed project, as well as any recommendations to eliminate potential hazards.

Table 4.13.A: Recognized Environmental Conditions

REC	Location	Source/Cause	Sampling Results/ Determination	Recommendation
Chlorinated Solvents and 1,4-Dioxane	Deep groundwater (between 238 and 246 feet bgs beneath project site)	Unknown	Does not pose a significant risk due to depth of affected groundwater.	Additional investigation is not recommended.
Aerially Deposited Lead	Soils underlying project site	Proximity to SR-22 roadway	Lead concentrations detected in soil samples were below applicable screening levels and therefore do not pose a significant risk.	Additional investigation is not recommended.
Benzene and Ethylbenzene (Potential Vapor Encroachment Condition)	Soil and/or groundwater underlying the project site	LUST associated with former gasoline service station operations on site (1968-1994)	Remediated and marked as “case closed’ in 2003, but residual concentrations exceed residential screening levels	Adherence to the Soil Management Plan if soil is to be disturbed during construction activities; adherence to OSHA health and safety guidance.

Source: *Phase I Environmental Site Assessment*, Ninyo & Moore, October 2024, *Limited Phase II Environmental Site Assessment*, Ninyo & Moore, March 2025 (included as Appendix F to this IS/MND).
LUST = Leaking Underground Storage Tank REC = Recognized Environmental Condition

As shown in Table 4.13.A above, the RECs involving chlorinated solvents, 1,4-dioxane, and aerially deposited lead were determined not to pose a significant hazard to the project site or the proposed project. However, the Limited Phase II ESA ultimately concluded that the known release of petroleum hydrocarbons from the former gasoline service station still impacts soils underlying the project site, as indicated by the presence of total petroleum hydrocarbons (TPH) diesel range organics in soil samples and tetrachloroethene and benzene in soil vapor samples at levels that exceeded allowable concentrations for commercial or residential development. In addition, one boring encountered arsenic below 10 feet bgs that exceeded maximum allowable concentrations. These maximum allowable concentrations have been set to limit human exposure to certain substances with the potential to pose a threat to human health.

Construction. Construction activities associated with the proposed project would include excavation and grading activities that would disturb soils underlying the project site. Because the Limited Phase II ESA indicated that soils underlying the project site contain concentrations greater than the maximum allowable thresholds of potentially harmful substances, construction of the proposed project could create a hazard to the public through the release of these substances during soil disturbance activities. However, the Limited Phase II ESA contained several recommendations that would reduce potential impacts associated with a release of hazardous chemicals during soil disturbance activities to a less than significant level, including adherence to OSHA health and safety guidance as well as the SMP prepared for the proposed project by the geotechnical consultant. The purpose of the SMP is to identify standard management practices to be implemented during soil disturbance activities (including precautions for worker safety), and considerations for sampling, management, and proper disposal of contaminated soils and waste materials (if encountered). As specified in Mitigation Measure (MM) HAZ-1, the proposed project would be required to comply with the recommendations presented in the Limited Phase II ESA and, by extension, the SMP. Adherence to these recommendations and protocols would ensure the safe handling and disposal of any potentially hazardous materials encountered during construction of the proposed project. In April 2025, Ninyo & Moore prepared a Human Health Risk Assessment and Vapor Intrusion Mitigation Recommendation (HHRA). As previously stated, the results of the Limited Phase II ESA indicated that petroleum hydrocarbons, particularly diesel fuel, impacts the on-site soil.

The HHRA calculated the site's potential for adverse non-cancer effects due to exposure to an individual chemical of potential concern, which is expressed as the hazard quotient. The HHRA also calculated the site's cancer risk, which is expressed as the upper-bound, increased likelihood of an individual developing cancer as a result of exposure to a particular chemical. The HHRA concluded that both the hazard quotient and cancer risk estimates fall within levels considered safe by applicable health and environmental protection agencies, and therefore the volatile organic compounds detected in soil vapor at the site do not pose a threat the on-site occupants. However, as a conservative measure, the HHRA recommends the installation of a vapor membrane beneath the slab of each of the three proposed buildings to counteract potential future vapor intrusion. The HHRA also recommended that impacted soils encountered during construction activities be handled in accordance with the SMP. As specified in MM HAZ-2, the proposed project would be required to comply with recommendations presented in the HHRA, including the handling of soils in accordance with the SMP (as also mandated by MM HAZ-1) and the installation of vapor membranes beneath the proposed buildings. Therefore, with implementation of MM HAZ-1 and MM HAZ-2, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation. As previously stated, operations of the proposed project would use limited amounts of hazardous substances associated with educational and residential uses, the potential release of which

would not create a significant hazard to the public or the environment. Based on this, and the information presented above, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant with incorporation of MM HAZ-1 and MM HAZ-2.

Mitigation Measures:

MM HAZ-1 **Compliance with the Recommendations of the Limited Phase II Environmental Site Assessment and Soil Management Plan.** Prior to the issuance of grading permits, the Director of Orange County Public Works Department, or their designee, shall verify that the requirements and recommendations presented in the Limited Phase II Environmental Site Assessment (ESA) and the Soil Management Plan (SMP) have been appropriately incorporated into planned construction procedures. Grading operations and construction shall be conducted in conformance with all of the recommendations included in the Phase II ESA, which was prepared by Ninyo & Moore, titled *Limited Phase II Environmental Site Assessment, Workforce Reentry Center, 561 The City Drive South* (March 28, 2025), as well as the SMP, also prepared by Ninyo & Moore, titled *Soil Management Plan, Workforce Reentry Center, 561 The City Drive South* (December 6, 2024). All recommendations contained in the Limited Phase II ESA and SMP shall be incorporated into construction protocols and shall include, but not be limited to:

- In the event that arsenic, total petroleum hydrocarbons (TPH) diesel range organics (GRO), or tetrachloroethene (PCE), or benzene are encountered during soil disturbance activities, Occupational Safety and Health Administration (OSHA) health and safety guidance and SMP protocols shall be followed;

- Adherence to the SMP if soil is to be disturbed during construction activities, including:

    - Protocols for excavation, temporary stockpiling, handling, and disposal of impacted soil that may be encountered at the site;

    - Guidance for monitoring requirements to be followed during excavation activities, stockpiling procedures, requirements for excavated soil waste characterization (and any resulting soil disposal requirements), sampling and analytical requirements in the event impacted soil is encountered; and

    - Soil screening levels which shall be used for comparison to any analytical results obtained, and any applicable regulatory reporting requirements.

Additional site construction plans and procedures, including grading plans, shall be reviewed by the project Geotechnical Consultant prior to construction to check for conformance with all of the recommendations of the Limited Phase II ESA and the SMP. Grading and construction shall be performed in accordance with the requirements of the applicable protocols identified in the SMP, as well as the recommendations of the project Geotechnical Consultant as stated in the Limited Phase II ESA, which shall be reviewed by

the Director of the Orange County Public Works Department, or their designee, prior to the issuance of grading permits.

MM HAZ-2 **Compliance with Recommendations of the Human Health Risk Assessment Technical Memorandum.** Prior to the issuance of grading permits, the Director of Orange County Public Works Department, or their designee, shall verify that the requirements and recommendations presented in the Human Health Risk Assessment (HHRA) have been appropriately incorporated into planned construction procedures. Grading operations and construction shall be conducted in conformance with all of the recommendations included in the HHRA, which was prepared by Ninyo & Moore, titled *Human Health Risk Assessment Report and Vapor Intrusion Mitigation Recommendation – Technical Memorandum, April 1, 2025.* All recommendations found in the HHRA shall be incorporated into construction protocols and shall include, but not be limited to:

- Impacted soils encountered during construction activities shall be handled in accordance with the SMP; and
- Installation of a vapor membrane beneath the slab of each proposed building to counteract potential future vapor intrusion.

Question 4.13 c): Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Response to Question 4.13 c):

Less than Significant With Mitigation Incorporated. The project site is within a 0.25-mile radius of the Orangewood Children's Home and the Children's Home Society of California, both of which include educational programs on-site.

As discussed in Response to Question 4.9 a), construction of the proposed project is not anticipated to handle acutely hazardous materials, substances, or wastes in significant quantities. Construction activities associated with the proposed project would use a limited amount of hazardous and flammable substances/oils during heavy equipment operation for site excavation, grading, and construction. The amount of hazardous, chemicals present during construction is limited and would be in compliance with existing government regulations. Further, the potential for release of contaminants from soils underlying the project site during ground disturbance activities would be reduced to a less than significant level with adherence to the recommendations in the Limited Phase II ESA, SMP, and HHRA, pursuant to MMs HAZ-1 and HAZ-2. As such, construction of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

As previously stated, vapor membranes would be installed beneath all three proposed buildings to avoid potential future vapor intrusion that could result in long-term health risks during operation of the proposed project. During operation of the proposed project, vocational training activities and residential routines would not require the use, storage, disposal, or transport of large volumes of hazardous materials that could cause serious environmental damage in the event of an accident. Although hazardous substances would be present and utilized in limited amounts, such substances are generally present now in the existing development, are typically found in small quantities, and can be cleaned up without

affecting the environment. Therefore, impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school would be less than significant with incorporation of MM HAZ-2.

Question 4.13 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?

Response to Question 4.13 d):

Less Than Significant with Mitigation Incorporated. Government Code Section 65962.5 states that the California Department of Toxic Substances Control (DTSC) shall compile and maintain annually a list (Cortese List) of hazardous waste facilities subject to corrective action as part of the Health and Safety Code. Cortese List data resources include the DTSC EnviroStor database, the State Water Resources Control Board (SWRCB) GeoTracker database, and other resources identified by the California Environmental Protection Agency (CalEPA).[45]

As part of the Phase I ESA, Environmental Data Resources, Inc. (EDR) conducted a search of available environmental records within including federal, State, tribal, and local databases for the project site and properties up to 1.0 mile away from the project site.

The project site address can be considered either 561 The City Drive South and 591 The City Drive South. As such, the EDR search was conducted for both addresses. The address of 561 The City Drive South is listed in the following environmental databases searched by EDR:

- Hazardous Waste Tracking System
- Hazardous Materials Manifests Network
- NPDES)
- California Integrated Water Quality System

However, given the lack of reported spills and incidents over the years and small quantities (on average less than 1 ton per year) of hazardous wastes generated, these listings are unlikely to pose a substantial hazard to the proposed project, and are not considered further.

The address of 591 The City Drive South is listed in the following environmental databases searched by EDR:

- GeoTracker Leaking Underground Storage Tank (LUST)
- Statewide Environmental Evaluation and Planning System Underground Storage Tank Listing (SWEEPS UST)
- State Water Resources Control Board Underground Storage Tanks
- UST FINDER RELEASE
- Hazardous Waste and Substance Site List (CORTESE)/HIST CORTESE
- California Environmental Reporting System

[45] California Environmental Protection Agency (CalEPA). 2024. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/ (accessed January 8, 2025).

A majority of these listings are unlikely to pose a substantial hazard to the proposed project due to factors such as remediation, distance from the project site, or the passage of time, and are not considered further. However, results of concern include the SWEEPS UST database, which indicate that as of 1993, the project site contained three underground storage tanks, including two 9,950-gallon motor vehicle fuel tanks containing regular, unleaded fuel, and one 280-gallon waste oil tank.

According to the (SWRCB GeoTracker database, the project site had a case listed under UNOCAL #5618 (T0605901216) and the address 591 The City Drive South and contained groundwater data in association with a LUST due to former gasoline service station operations on site between 1968 and 1994. Borings conducted in 1990 indicated the presence of petroleum-related hydrocarbons, which indicated a release in the vicinity of the gasoline USTs and associated piping. As a result, vapor extraction wells and groundwater monitoring wells were established on site, and UST and soil vapor removal systems were established to begin remediation of the site. A soil vapor extraction system was operational on the project site through 1998, and in 2003, the Santa Ana Regional Water Quality Control Board (RWQCB) deemed the condition "case closed." According to the Case Closure Summary prepared by the Santa Ana RWQCB, the significant decrease in soil contamination concentrations as a result of the remediation activities eliminated any potential threats to groundwater quality and/or human health.

However, in the time that has passed since the publication of the 2003 Case Closure Summary, maximum allowable contaminant thresholds have been updated. Based on these updates, current regulatory screening levels from the concentrations of hazardous contaminants exceed current screening levels set forth by the DTSC and the EPA, which was discussed as a REC in Response to Question 4.13 b). As discussed in Response to Question 4.13 b), the proposed project's adherence to the recommendations provided in the Limited Phase II ESA and the SMP, as set forth in MM HAZ-1, would ensure that potential contaminants are appropriately removed and disposed of during construction of the proposed project. Further, the proposed project's adherence to the recommendations provided in the HHRA, including the installation of a vapor membrane below each proposed building, as set forth in MM HAZ-2 would ensure that the proposed project does not face long-term risks associated with soil contamination. As such, the results pertaining to this condition in the EDR database search would not present a potential hazard to the proposed project.

Therefore, although the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the proposed project's compliance with MMs HAZ-1 and HAZ-2 would ensure that it would not create a significant hazard to the public or the environment, and impacts would be less than significant with incorporation of these mitigation measures.

Question 4.13 e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Response to Question 4.13 e):

No Impact. The project site is not near or within an airport land use plan, nor within 2 miles of a public or public use airport. The closest airports to the project site are John Wayne Airport and Fullerton Municipal Airport, which are located approximately 7 miles south and 8 miles northwest of the project site, respectively. Therefore, no impact would occur, and no mitigation is required.

Question 4.13 f): Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Response to Question 4.13 f):

Less than Significant Impact. As previously stated, access to the project site would be provided via three driveways along The City Drive South. As discussed in the Response to Question 4.24 a-i) of Section 4.24, Wildfire, an emergency plan for the site is a required element of the proposed project for compliance with the State Fire Code and California Code of Regulations. According to the City's General Plan Public Safety Element[46] Figure PS-4, Generalized Evacuation Corridors, The City Drive South is designated as an evacuation corridor by the City. In addition, according to the City's Local Hazard Mitigation Plan,[47] Orangewood Avenue is the only road within proximity to the project site designated as an evacuation route. However, according to the City's General Plan Public Safety Element, the City of Orange Emergency Operations Plan does not specify evacuation routes because such routes for emergency situations are contingent upon the scale and location of the emergency and would change depending on the direction of evacuation required by the situation. Construction of the proposed project would be contained within the project site and would have a minimal impact on surrounding roadways as all construction equipment would be staged on-site. During construction, temporary delays, road closures, or road obstructions may occur, creating potential minor delays in emergency situations. Construction debris would be hauled off-site, utilizing main roads to arrive at an OCWR approved construction and demolition waste diversion facility yet to be determined. The project site's close proximity to the SR-22/The City Drive interchange would allow any debris haul trips to directly access the regional freeway system without using local streets. The proposed off-site improvements to The City Drive and Metropolitan Drive under the proposed project would improve vehicular access to the project site and would not result in any substantial adverse changes to the public street systems. Therefore, the proposed project would therefore not create any significant impacts on any emergency plans in the local or regional area. Therefore, any impacts would be less than significant, and no mitigation is required.

Question 4.13 g): Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Response to Question 4.13 g):

Less than Significant Impact. The project site is in an urbanized and developed area within the City and is not located near any wildlands or urbanized areas adjacent to wildlands. The nearest wildland classified by CAL FIRE as a Fire Hazard Severity Zone (FHSZ) is approximately 5 miles east of the project site.[48] Therefore, as discussed in greater detail in Section 4.24, Wildfire, of this IS/MND, impacts would be less than significant. No mitigation is required.

[46] City of Orange. 2015a. Orange General Plan Public Safety Element. Website: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000 (accessed January 9, 2025).

[47] City of Orange. 2016. Hazard Mitigation Plan. October. Website: https://www.cityoforange.org/home/showpublisheddocument/5603/638544764116000000 (accessed January 9, 2025).

[48] CAL FIRE. n.d. Fire Hazard Severity Zones. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed May 4, 2025).

4.14 *Hydrology and Water Quality*

Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would: i) result in substantial erosion or siltation on- or offsite?	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

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

The following analysis is based upon information presented in the Preliminary Water Quality Management Plan (pWQMP) and Preliminary Hydrology and Drainage Study prepared for the proposed project by LPA Design Studios in January 2025. These documents are included within this IS/MND as Appendices G and H, respectively. It should be noted that these reports were prepared prior to the demolition of the animal shelter structures to grade and the removal of vegetation that previously existed on the project site. Demolition occurred in April and May 2025. Therefore, although analysis presented in these reports include on-site structures that have since been demolished, these features are no longer present. For purposes of the environmental analysis in this IS/MND the existing condition of the project site is a vacant disturbed lot.

Question 4.14 a): Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Response to Question 4.14 a):

Less than Significant Impact. At the time the pWQMP was prepared, the project site generally drained from south to north due to the slight grade of the site. Two existing storm drain pipes run beneath the project site. An existing 45-inch City storm drain pipe traverses the middle of the project site from west to east, conveying flows from an existing gutter along the eastern edge of The City Drive South toward the Santa Ana River Channel. An existing 66-inch regional storm drain pipe also traverses the southern boundary of the project site from west to east, carrying flows from The City Drive South to the Santa Ana River Channel. Small drainage areas along the western edge of the project site discharge as surface flows and are collected by a gutter located on the eastern curb of The City Drive South, which serves as a collection point for stormwater runoff generated within the project site under existing conditions. These gutter flows then enter a public storm drain inlet and into the 45-inch storm drain pipe mentioned above before ultimately being discharged to the Santa Ana River.

The Santa Ana River Channel, through which the Santa Ana River flows, is a concrete trapezoidal flood control channel with an earthen bottom managed by the Orange County Flood Control District (OCFCD). The Santa Ana River ultimately flows into the Pacific Ocean between Newport Beach and Huntington Beach. When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the Clean Water Act (CWA) requires identifying and listing that waterbody as impaired. The SWRCB approved the 2020–2022 California Integrated Report (CWA Section 303(d) List/305(b) Report) on February 6, 2024. This list is current as of the preparation of the pWQMP for the proposed project. According to the pWQMP, the proposed project's receiving body, the Santa Ana River, is listed as impaired for cadmium in the latest CWA Section 303(d) List. However, the segment of the Santa Ana River in the project site proximity is not considered an Environmentally Sensitive Area.

The proposed project would involve the construction of three new buildings as well as associated landscaping and hardscaping. Landscaped areas would include trees and shrubs compliant with County landscaping requirements and specifications. Landscaping would have low water usage and be

appropriate for the Southern California climate. Hardscaped areas would include the new parking lot and sidewalks. Under post-project conditions, the ratio of impervious to pervious surface area would be approximately 86 percent to 14 percent, respectively. The total impervious area under the proposed project would be 3.94 acres. This represents a 0.61 acre increase over the amount of impervious surface on the project site prior to demolition of the animal shelter structures to grade and a 3.94 acre increase over the project site's existing condition as a vacant disturbed lot.

Under the proposed project, approximately 93 percent of runoff would be captured via drain inlets and catch basins. The proposed project would include a new underground storm drain system, comprised of three parts, which would pretreat runoff in hydrodynamic separators before discharging into a separate infiltration system for each of the project site's six Drainage Management Areas. The remaining 7 percent would drain as surface flow to the existing gutter along The City Drive South, as it does under existing conditions.

Pollutants of concern during construction include, but are not limited to: solid or liquid chemical spills; wastes from paints, stains, sealants, glues, lime, pesticides, herbicides, wood preservatives and solvents, asbestos fibers, paint flakes or stucco fragments; fuels, oils, lubricants, and hydraulic, radiator or battery fluids; concrete, detergent or floatable wastes; wastes from any engine/equipment steam cleaning or chemical degreasing; and super-chlorinated potable water line flushing. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters (i.e., the municipal storm drain system which discharges into the Santa Ana River, and ultimately into the Pacific Ocean). Stormwater runoff is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the federal Clean Water Act [CWA]). The objective of the NPDES Program is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the Santa Ana Regional Water Quality Control Board (RWQCB). Construction activities can be subject to the SWRCB NPDES *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit) depending on the degree of soil disturbance. Any construction activity, including grading, that would result in the disturbance of 1 acre or more of soil would require compliance with SWRCB's Construction General Permit, which requires preparation of a Stormwater Pollution Prevention Program (SWPPP) and implementation of Construction BMPs to address water quality concerns during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

The proposed project's operational activities are subject to the NPDES *Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062* (MS4 Permit). The MS4 Permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. The MS4 Permit requires co-permittees, including the County, to develop and implement standard design and post-development BMP guidance to guide application of low impact development (LID) BMPs to the maximum extent practicable. Specifically, LID performance criteria for North Orange

County state that priority projects must infiltrate, harvest and use, evapotranspire, or biotreat/filter the 85th percentile, 24-hour storm event. The MS4 Permit also requires preparation of a WQMP, implementation of post-construction BMPs, and hydromodification requirements (where applicable) for new development and significant redevelopment projects that qualify as "Priority Development" projects.

Division 13 of the County's Code of Ordinances codifies requirements related to water quality and stormwater discharges with the intention to improve water quality by controlling the pollutants which enter the network of storm drains throughout the County. Division 13 includes, but is not limited to, general provisions, prohibited discharges, control requirements, and monitoring and inspection procedures.

Section 4-13-50 of Division 13 requires that all new development and significant redevelopment projects under the County's jurisdiction shall be undertaken in accordance with the area-wide 2007 Drainage Area Management Plan (DAMP) and all applicable provisions of the Santa Ana RWCB municipal storm water permit issued to the County. The DAMP provides a blueprint for the County and co-permittees to follow during implementation of stormwater pollution control programs. The County has also prepared a Local Implementation Plan (LIP) as part of a compliance program to satisfy the requirements set forth in the DAMP. The LIP outlines protocols for Countywide projects to implement in order to contribute to regional stormwater pollution control efforts and adhere to the requirements of applicable NPDES permits described above. In addition, all projects requiring discretionary approval and some requiring ministerial County approval are required to prepare a WQMP in accordance with the County's DAMP.[49] Therefore, all development projects, regardless of priority status, would be required to implement these features where applicable and feasible.

Construction. During construction of the proposed project, the total disturbed soil area would be equal to the entire project site, approximately 4.6 acres. Because construction of the proposed project would disturb greater than 1 acre of soil, the project is subject to the requirements of the Construction General Permit, as specified in Regulatory Compliance Measure (RCM) HYD-1. The Construction General Permit requires preparation of a SWPPP and implementation of construction BMPs during construction activities. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

According to the pWQMP, groundwater was encountered within the project site between 27.8 and 35.9 feet bgs. The maximum depth of excavation anticipated under the proposed project would be 16 ft bgs. Therefore, groundwater dewatering is not anticipated during construction of the proposed project but is still a possibility. As specified in RCM HYD-2, in the event groundwater dewatering activities would occur, the proposed project would comply with the *Waste Discharge Requirements (WDR) Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality (Groundwater Discharge Permit)* (Order No. R8-2020-0006, NPDES No. CAG998001). In compliance with the requirements of the Groundwater Discharge Permit, groundwater would be tested and treated (if necessary) prior to discharge to surface waters. With adherence to RCM HYD-2, groundwater dewatering during construction activities, if necessary, would not introduce pollutants to receiving waters at levels

[49] City of Orange. n.d.-a. Storm Water Program – Water Quality Management Plans. Website: https://www.cityoforange.org/our-city/departments/public-works/engineering-division/storm-water (accessed January 13, 2025).

that would violate water quality standards or water discharge requirements, degrade water quality, or alter the quality of receiving waters.

Infiltration of stormwater can have the potential to affect groundwater quality in areas of shallow groundwater. As discussed above, the groundwater table was not encountered up to a depth of 27.8 ft bgs. Pollutants in stormwater are generally removed by soil through absorption as water infiltrates. Therefore, in areas of deep groundwater, there is more absorption potential and, as a result, less potential for pollutants to reach groundwater. Therefore, due to the depth to groundwater, it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because there is not a direct path for pollutants to reach the groundwater table. Therefore, project construction would not substantially degrade groundwater quality.

With implementation of RCM HYD-1 and RCM HYD-2, which require adherence to the NPDES Construction General Permit and Groundwater Discharge Permit, construction of the proposed project would not interfere with surface water quality standards, waste discharge requirements, and surface water quality.

Operation. The proposed project consists of a facility to assist adult individuals involved in the criminal justice system or other County systems of care with transitioning from prison to the workforce, and would include vocational, educational, and recreational aspects. According to the pWQMP, pollutants of concern from long-term operations of the proposed project include suspended solids/sediments; nutrients (such as nitrogen and phosphorous) found in fertilizers and waste; pesticides; bacteria; viruses; pathogens; petroleum products (such as oil and grease); heavy metals (such as copper, lead, cadmium, etc.); toxic organic compounds, and trash and debris. As previously stated, the proposed project's receiving water body, the Santa Ana River, is considered impaired for the heavy metal cadmium.

As previously stated, operational activities are subject to the NPDES MS4 Permit. The MS4 Permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. The MS4 Permit requires co-permittees, including the County, to develop and implement standard design and post-development BMP guidance to guide application of LID BMPs to the maximum extent practicable. The MS4 Permit also requires preparation of a WQMP and implementation of post-construction BMPs, as well as hydromodification requirements for new development and significant redevelopment projects that qualify as "Priority Development" projects.

As previously stated, a pWQMP has been prepared for the proposed project. The pWQMP specifies the site design and source control BMPs that would be implemented to target the pollutants of concern in runoff from the project site in order to reduce impacts to water quality during operation. As specified in RCM HYD-3, a final version of the WQMP will be refined during final design based on the final site plan.

Site design BMPs would also be utilized for treatment of storm water on site using project design features, consistent with the requirements of the *North Orange County Model WQMP*[50] and *Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs)* (TGD).[51] The proposed project would include infiltration BMPs in order to meet the required LID Design Storm Capture Volume. Specifically, three corrosion-resistant high-density polyethylene (HDPE) retention/detention pipe systems would be installed beneath the project site, including

[50] OC Public Works. 2011. Model Water Quality Management Plan (Model WQMP). May.

[51] County of Orange. 2013. Technical Guidance Document (TGD) for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs). December 20. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/2021-06/OC_TGD%2812-20-2013%29.pdf (accessed January 14, 2025).

hydrodynamic separators. These systems would consist of an underground network of pipes that would store, treat, and release stormwater runoff generated within the project site after it flows through the proposed landscaped areas. The proposed hydrodynamic separators would remove suspended solids and floatables such as oil from stormwater using the force of gravity. In addition, outlets for each infiltration system would include trash capture devices to filter out any larger debris. With incorporation of these systems, the proposed project would be capable of storing, treating, and releasing the required design capture volume (DCV) of stormwater runoff generated within the project site, and would filter out potential pollutants. Therefore, the proposed project would be capable of reducing 2-year, 24-hour storm peak flows to zero, and would not contribute to any existing or new Section 303(d) water body impairments. Further, as described in RCM HYD-4 below, the Preliminary Hydrology and Drainage Study would be refined into a final report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions.

As specified in the pWQMP, the proposed project would also incorporate source control BMPs, including routine non-structural BMPs and routine structural BMPs. Specifically, routine non-structural BMPs under the proposed project include education for property owners, tenants, and occupants; activity restrictions (e.g., no discharges of fertilizer, pesticides, and wastes to streets or storm drains; no hosing down of paved surfaces; no vehicle washing or maintenance); common area landscape management; BMP maintenance; Title 22 CCR Compliance; local industrial permit compliance; spill contingency plan; underground storage tank compliance; hazardous materials disclosure compliance; Uniform Fire Code implementation; common area litter control; employee training; common area catch basin inspection; and street sweeping private streets and parking lots. Routine structural BMPs to be incorporated into the proposed project include storm drain stenciling and signage; design and construction of trash and outdoor material storage areas to reduce introduction of pollution; use of efficient irrigation systems and landscape design; and protecting slopes and channels and providing energy dissipation.

As discussed previously, infiltration of stormwater could have the potential to affect groundwater quality in areas of shallow groundwater. Due to the depth to groundwater, it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because there is not a direct path for pollutants to reach groundwater. In addition, the proposed project would be required to implement operational BMPs to pre-treat stormwater before it could reach groundwater. With implementation of RCM HYD-1 through RCM HYD-4, which are required and based on local and State regulations, construction and operational impacts related to waste discharge requirements, water quality standards, and degradation of surface or groundwater quality would be less than significant. No project-specific mitigation is required.

Regulatory Compliance Measures:

RCM HYD-1 **Construction General Permit.** Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities,* Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of Orange (County) Public Works Department, or designee, to demonstrate proof of coverage under the

Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction best management practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.

RCM HYD-2 **Groundwater Discharge Permit.** If groundwater dewatering is required during construction of the proposed project, the Project Applicant shall submit a Notice of Intent (NOI) for coverage under the permit to the Santa Ana RWQCB at least 60 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters in order to obtain coverage under the Waste Discharge Requirements (WDR) Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality (Groundwater Discharge Permit) (Order No. R8-2020-0006, NPDES No. CAG998001). Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.

RCM HYD-3 **MS4 Permit.** Prior to the issuance of grading or building permits, the Project Applicant shall submit a Final Water Quality Management Plan (WQMP) to the Orange County Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES *Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region,* Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). The Final WQMP shall be prepared consistent with the requirements of the County of Orange Technical Guidance Document for Water Quality Management Plans (TGD) and the North Orange County Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The Orange County Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design, and shall implement, maintain and operate all such BMPs in a timely and reasonably diligent manner.

RCM HYD-4 **Final Hydrology Report.** Prior to issuance of a grading permit, the Project Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The Project Applicant shall provide the Final Hydrology Report to the Director of the Orange County Public Works Department, or their designee, for review and approval.

Question 4.14 b): Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Response to Question 4.14 b):

Less than Significant Impact.

It should be noted that two OCWD groundwater monitoring wells are present within the project site. However, OCWD's license to use the property expired in 2000. OCWD is responsible for abandoning and removing these wells, which will be completed independently of the proposed project. As such, the project site consists of a vacant disturbed lot, and no groundwater monitoring or extraction wells currently exist within the project site.

Construction. Overall, construction of the proposed project would not generate a substantial demand for groundwater. Please refer to Section 4.23, Utilities and Service Systems, for a detailed discussion of water supply and demand during construction of the proposed project. As mentioned previously, groundwater was encountered in borings as shallow as 27.8 and up to 35.9 feet bgs. As previously stated, the proposed project could require excavation activities reaching depths of up to 16 ft bgs. While groundwater dewatering during construction could decrease groundwater supplies or interfere with groundwater recharge, this activity is unlikely to occur during construction of the proposed project given that the maximum excavation depth is not anticipated to reach depths where groundwater is known to be present. However, because it is still a possibility, the proposed project would adhere to RCM HYD-2. As specified in RCM HYD-2, in the event groundwater dewatering activities would occur, the proposed project would comply with the Groundwater Discharge Permit, under which groundwater would be tested and treated (if necessary) prior to discharge to surface waters. With adherence to RCM HYD-2, groundwater dewatering, if necessary during construction activities, would not interfere with groundwater recharge. In addition, if groundwater dewatering is required during construction of the proposed project, dewatering activities would be temporary, and the volume of groundwater removed would not be substantial. Therefore, construction of the proposed project would not substantially decrease groundwater supplies such that the project may impede sustainable groundwater management or recharge of the basin. Construction impacts associated with substantial decrease in groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation is required.

Operation. Operations of the proposed project would not directly require groundwater extraction. Water usage within the project site, which may be partially sourced from groundwater sources and supplemented by purchased imported water and surface water. Water usage within the project site would be typical of the proposed land uses, and water services currently utilized within the project site would continue to serve the proposed project. As such, the proposed project would not represent a significant contribution to regional water consumption. Refer to Section 4.23, Utilities and Service Systems, for more details regarding the proposed project's anticipated water usage.

According to the pWQMP, the proposed project would increase the proportion of impervious area on the project site by approximately 11 percent. However, because the pWQMP compares the proposed project to conditions on the project site before demolition of the animal shelter structures to grade, the actual increase in impervious surface area from post-demolition conditions is likely to be higher. The proposed increase in impervious surface area as a result of project implementation would potentially increase the volume of stormwater runoff generated within the project site. However, the proposed underground retention/detention system would be capable of reducing the 2-year, 24-hour storm peak flows to zero. The total volume provided by the three systems would amount to 12,600 cubic feet (cf), which exceeds the project DCV, or the volume of stormwater runoff that a BMP needs to be able to store and treat, of 10,308 cf.

Because the subsurface infiltration site design BMPs included within the proposed project's design would be capable of capturing, treating, and releasing 2-year, 24-hour storm peak flows in a controlled manner, the proposed project would not result in increased peak flow runoff conditions as compared to existing conditions, and therefore would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. For the reasons listed above, and with implementation of RCM HYD-2 if construction dewatering is required, impacts related to the decrease of groundwater supplies or interference with groundwater recharge would be less than significant, and no mitigation is required.

Question 4.14 c): Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:

Question 4.14 c-*i*): result in substantial erosion or siltation on- or offsite?

Response to Question 4.14 c-*i*):

Less than Significant Impact. As previously stated, two separate storm pipes currently run beneath the project site. An existing 45-inch City storm drain pipe traverses the middle of the project site from west to east, conveying flows from The City Drive South toward the Santa Ana River Channel. An existing 66-inch regional storm drain pipe also traverses the southern boundary of the project site from west to east, carrying flows from The City Drive South to the Santa Ana River Channel. Small drainage areas along the western edge of the project site discharge as surface flows and are collected by a gutter located on the eastern curb of The City Drive South, which serves as a collection point for stormwater runoff generated within the project site under existing conditions. These gutter flows then enter a public storm drain inlet and into the 45-inch storm drain pipe mentioned above. The Santa Ana River Channel, where stormwater generated within the project site is ultimately discharged, is a concrete trapezoidal flood control channel with an earthen bottom managed by the OCFCD. The Santa Ana River ultimately flows into the Pacific Ocean between Newport Beach and Huntington Beach.

As previously stated, under the proposed project, the project site would be graded so nearly the entire property drains from south to north, in a manner consistent with the site's existing drainage characteristics. While the proposed project would not alter the course of an existing stream or river, including the Santa Ana River, the proposed project would result in changes to the ratio of impervious surfaces to pervious surfaces within the project site. Specifically, the proposed project would increase the proportion of impervious surfaces within the project site through the proposed structures and hardscaping.

Construction. During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above in Response to Question 4.14 a), and as specified in RCM HYD-1, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. With compliance with the Construction General Permit as indicated in RCM HYD-1, construction impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

Operation. The existing environmental baseline for the proposed project consists of a disturbed vacant lot. The proposed project includes the development of three buildings with a combined building footprint totaling approximately 45,500 sf, as well as associated landscaping, hardscaping, and utility improvements. Because the proportion of impervious surfaces within the project would increase under the proposed project, there is the potential for the proposed project to alter the existing drainage pattern of the site.

Hydromodification is defined as hydrologic changes resulting from increased runoff from increases in impervious surfaces. Hydromodification impacts can included changes in downstream erosion and sedimentation. Significant redevelopment projects are subject to specific hydromodification requirements of the North Orange County MS4 Permit and must implement measures for site-design, source control, runoff reduction, stormwater treatment, and baseline hydromodification management. According to the pWQMP, because post-development runoff volumes would exceed pre-development runoff volumes for the 2-year, 24-hour storm, the proposed project would have a hydrologic condition of concern[52] and is subject to hydromodification control requirements. As such, the proposed project would incorporate hydromodification BMPs in order to reduce 2-year, 24-hour storm peak flows to zero. Specifically, the proposed project would incorporate corrosion-resistant HDPE pipe retention/detention systems beneath the project site. With incorporation of these systems, the proposed project would be capable of storing, treating, and releasing the required DCV of stormwater runoff generated within the project site. Further, as specified in RCM HYD-4, a Final Hydrology Report would be required in order to demonstrate that the proposed project would not increase runoff from the project site beyond that generated under existing conditions.

With incorporation of infiltration retention/detention BMPs and adherence to RCM HYD-4, the proposed project is not anticipated to result in downstream erosion or siltation. Impacts would be less than significant, and no mitigation is required.

Question 4.14 c-*ii*): substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Response to Question 4.14 c-*ii*):

Less than Significant Impact.

Construction. Construction activities would alter the on-site drainage pattern, potentially compacting on-site soil and increasing the potential for flooding compared to existing conditions. As discussed in Response to Question 4.14 c-*i*) above, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project, as specified in RCM HYD-1. The SWPPP would include construction BMPs to control and direct on-site surface runoff to ensure that flooding does not occur. The County's LIP also requires compliance with all applicable construction BMPs set forth in the County's DAMP. Under these requirements, fill slopes at the construction site perimeter must drain away from the top of the slope that the conclusion of each working day, which would reduce the volume of surface runoff beyond the project site. Proper management of stormwater during construction would reduce impacts associated with on and off-site flooding.

[52] Areas designated as hydrologic conditions of concern are watersheds of unarmored or soft-armored drainages that are vulnerable to geomorphology changes due to hydromodification.

Operation. As previously noted, the development of the project site with the proposed Workforce Reentry Center would incorporate BMPs as feasible to avoid increasing the volume of runoff from the project site compared to existing conditions. Specifically, the proposed project would include three underground retention/detention systems, including hydrodynamic separators, as well as various structural and non-structural source control BMPs. With incorporation of these BMPs, operation of the proposed project would not increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Impacts would be less than significant, and no mitigation is required.

Question 4.14 c-*iii*): create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff?

Response to Question 4.14 c-*iii*):

Less than Significant Impact.

Stormwater Drainage System Capacity. As a co-permittee of the Santa Ana RWQCB, the County is responsible for ensuring that existing infrastructure is capable of supporting new development and redevelopment under its jurisdiction. As previously stated, the increase in impervious surface area under the proposed project would not be expected to increase peak flow and stormwater runoff volumes generated from the project site in comparison to existing conditions with incorporation of the proposed underground retention/detention systems. Implementation of BMPs during construction and operation of the proposed project, pursuant to RCM HYD-1, would ensure that the proposed project would not create or contribute runoff water to the project site's stormwater drainage system in excess of the system's capacity. Further, the proposed project would not eliminate or otherwise interfere with the operation of any drainage infrastructure or facilities. Therefore, the proposed project would not exceed the capacity of the existing downstream stormwater drainage system.

Polluted Runoff. As discussed in the Response to Question 4.14 a), pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals, and each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. The proposed project would be required to contain runoff from construction equipment and vehicle washing within the project site unless treated to remove sediment and other pollutants. As previously discussed, the proposed project must comply with the Construction General Permit, as specified in RCM HYD-1, which requires the preparation of a SWPPP and implementation of construction BMPs, both of which would address the presence of pollutants in stormwater generated within the project site.

Expected pollutants of concern from long-term project operations include suspended solids/sediments, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, and trash and debris. As previously discussed, the proposed project's compliance with the DAMP, LIP, and project-specific Final WQMP, as specified in RCM HYD-3, would ensure the implementation of applicable BMPs to target pollutants of concern during operations of the proposed project. As such, the proposed project would not discharge substantial sources of polluted runoff from the project site during operations.

With compliance with applicable regulations, including the Construction General Permit and MS4 permit as specified in RCM HYD-1 and RCM HYD-3, impacts associated with creating or contributing runoff water

which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff would be less than significant, and no mitigation is required.

Question 4.14 c-*iv*): Impede or redirect flood flows?

Less than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06059C0142J (effective since December 3, 2009), the project site is classified as Zone X, Area with Reduced Flood Risk due to Levee.[53] As such, the project site is protected from the 1-percent-annual-chance or greater flood hazard by a levee system along the Santa Ana River channel. In addition, the project site sits on an elevated grade from the Santa Ana River channel and does not propose any improvements or modifications to the channel. Further, according to both the City's General Plan Public Safety Element[54] and the County's General Plan Safety Element,[55] the project site is not within a 100-year or 500-year flood zone.

According to the Safety Element of the County's General Plan (2010), the project site is located within both the Santiago Reservoir Inundation Area and the Prado Dam Inundation Area.[56] Santiago Dam is located approximately nine miles east of the project site and Prado Dam is located approximately 16 miles northeast of the project site. However, as stated in the Geotechnical Exploration Report, catastrophic dam failure is highly unlikely due to the existence of strict dam safety regulations and maintenance enforced by the Division of Safety of Dams, United States Army Corps of Engineers (USACE), and Department of Water Resources (DWR). Further, given the distance of the dams from the project site, the risk of flooding of the project site in the event of dam failure is considered low. Therefore, the potential for inundation at the project site as a result of an earthquake-induced dam failure is considered insignificant.

Based on the information presented above, the project site is not considered at risk of flooding from storm events or dam failure. Therefore, the proposed project would not have the potential to impede or redirect flood flows. Impacts would be less than significant, and no mitigation is required.

Question 4.14 d): In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Response to Question 4.14 d):

Less than Significant Impact. As discussed above in the Response to Question 4.14 c-*iv*), the project site is not located within an area susceptible to flood hazards and would therefore not result in the risk of releasing pollutants during flooding.

Tsunamis are ocean waves generated by tectonic displacement of the seafloor associated with shallow earthquakes, seafloor landslides, rock falls, and exploding volcanic islands. Upon reaching shallow coastal

[53] Federal Emergency Management Agency (FEMA). 2009. National Flood Hazard Layer FIRMette. December 3. Website: https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/je88c58d7011044dfa14200e60e7b2f76/scratch/FIRMETTE_29d471a2-f709-4853-b895-6bb2fc7e41d8.pdf (accessed January 14, 2025).

[54] City of Orange. 2015a. City of Orange General Plan Public Safety Element. Website: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000 (accessed January 14, 2025).

[55] County of Orange. 2012b. Orange County General Plan Safety Element. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/40234.pdf (accessed January 14, 2025).

[56] City of Orange. 2015a. City of Orange General Plan Public Safety Element. Website: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000 (accessed January 14, 2025).

waters, the waves can reach up to 50 ft in height, causing great devastation to near-shore structures. The project site is not located within a coastal area and is located approximately 11 miles northeast of the Pacific Ocean coastline. The project site has an average elevation of approximately 124 feet above mean sea level. Therefore, the project site is not subject to inundation from tsunamis, and there is no risk of release of pollutants due to inundation from tsunami.

Seiching occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. According to the Geotechnical Investigation, there are no large enclosed bodies of water in the vicinity of the project site; therefore, the project site is not subject to inundation from seiche waves, and there is no risk of release of pollutants due to inundation from seiche.

Based on the information presented above, the project site is not at risk of pollutant release associated with inundation from a flood, tsunami, or seiche. Impacts would be less than significant, and no mitigation is required.

Question 4.14 e): Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Response to Question 4.14 e):

Less than Significant Impact. The Sustainable Groundwater Management Act (SGMA) is a comprehensive three-bill package signed into California state law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for the future.

The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. Specifically, SGMA requires the formation of local Groundwater Sustainability Agencies, which are required to adopt Groundwater Sustainability Plans (GSPs), or an approved alternative to a GSP, to manage the sustainability of groundwater basins in California. The project site is located within the Coastal Plain of Orange County Groundwater Basin, which is managed by the OCWD and is identified by the California Department of Water Resources as a medium priority basin.[57] As such, a GSP or an approved alternative plan is required for the Coastal Plain of Orange County Groundwater Basin. Alternative plans can be submitted in lieu of GSPs given that they demonstrate how water managers have already achieved or will achieve sustainable groundwater management to the satisfaction of the DWR and receive official DWR approval. In 2019, the DWR approved OCWD's Alternative Plan, which demonstrated how the Coastal Plain of Orange County Groundwater Basin has operated within its sustainable yield over a period of at least 10 years and is managed responsibly.[58]

As previously stated, the project site is within the jurisdiction of the Santa Ana RWQCB. The Santa Ana RWQCB has adopted a Water Quality Control Plan for the Santa Ana River Basin (i.e., Basin Plan) that designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the

[57] California Department of Water Resources (DWR). 2020. SGMA Basin Prioritization Dashboard, Groundwater Basins 2020. Website: https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed January 21, 2025).

[58] Orange County Water District (OCWD). 2019. State Approves OCWD Alternative Groundwater Management Plan. July. Website: https://www.ocwd.com/news-events/newsletter/2019/july-2019/state-approves-ocwd-alternative-groundwater-management-plan/ (accessed January 21, 2025).

water quality objectives and standards necessary to protect those beneficial uses. As summarized below, the proposed project would comply with the applicable NPDES permits and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff.

As discussed in the Response to Question 4.14 a), during construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters. As specified in RCM HYD-1, the proposed project would be required to comply with the NPDES Construction General Permit, which requires preparation of a SWPPP and implementation of construction BMPs to control stormwater runoff and discharge of pollutants.

As previously discussed, the primary pollutants of concern during project operations are suspended solids/sediments, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, and trash and debris. As discussed in RCM HYD-3, a final WQMP would be prepared in compliance with the North Orange County MS4 Permit. The final WQMP would detail the site design, LID, and source control and/or treatment control BMPs that would be implemented to treat stormwater runoff and reduce impacts to water quality during operation. The proposed site design BMPs (underground retention/detention systems including hydrodynamic separators) included within the design of the proposed project would treat stormwater runoff.

Because the proposed project would comply with applicable NPDES provisions, including preparation of a final WQMP, and includes implementation of construction and operational BMPs to reduce pollutants of concern in stormwater runoff, the project would not result in water quality impacts that would conflict with Santa Ana RWQCB's Basin Plan.

As discussed in the Response to Question 4.14 a), due to the depth to groundwater in comparison to anticipated excavation activities, it is not expected that any stormwater that may infiltrate during construction would affect groundwater quality because pollutants in stormwater are generally removed by soil through absorption as water infiltrates. In addition, the project would be required to implement operational BMPs to treat stormwater before it could reach groundwater. Additionally, groundwater extraction would not occur during operation of the proposed project as water infrastructure currently existing within the project site could serve the proposed project. Therefore, the proposed project does not have the potential to substantially impact groundwater quality, interfere with groundwater recharge, or decrease groundwater supplies, and would be consistent with OCWD's Alternative Plan for the Coastal Plain of Orange County Groundwater Basin. For the reasons outlined above and with implementation of RCM HYD-1 through RCM HYD-4, a less than significant impact would occur related to conflict with or obstruction of implementation of water quality control plans or sustainable groundwater management plans, and no mitigation is required.

4.15 *Land Use and Planning*

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

Question 4.15 a): Physically divide an established community?

Response to Question 4.15 a):

No Impact. As previously stated, existing conditions on the project site consist of a disturbed vacant lot. As stated in Section 3.0, Project Description, the project site is surrounded by public facility/institutional, commercial, open space, and mixed land uses. No residential uses currently exist within the project site or its immediate vicinity. While adult law violators live within the Theo Lacy Facility to the immediate north of the project site, this facility is a jail institution and therefore is not considered a residential community.

The proposed project would include the replacement of the existing security fencing between the Theo Lacy Facility and the project site with a security block wall. However, this wall would represent a replacement physical barrier rather than a new physical barrier and would be established for safety and security purposes. As such, the proposed project would not physically divide an established community. No impact would occur, and no mitigation is required.

Question 4.15 b): Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Response to Question 4.15 b):

Less than Significant Impact.

County of Orange General Plan. As required by Section 65300 of the California Government Code, the County has adopted a long-term, comprehensive plan for its future growth and land use decisions. The County General Plan provides information about the County, including demographics and existing environmental setting at the time the General Plan was prepared. The General Plan contains nine elements: Land Use, Transportation, Public Services and Facilities, Resources, Recreation, Noise, Safety,

Housing, and Growth Management. Each element contains various goals, policies, and objectives in order for the County to achieve its vision respective to each element.

The proposed project would be generally consistent with the goals and policies presented in the County's General Plan Safety Element. The proposed project would develop a disturbed, vacant property with the Workforce Reentry Center, which would provide housing and support services, such as vocational training, to assist adult individuals involved in the criminal justice system or other County systems of care with their reentry into the workforce. By developing an underutilized property with a facility that would fulfill an identified regional need. As a result of supportive programs offered under the proposed project, recidivism could decrease, and the County could subsequently see a decrease in criminal activity and a safer region overall. This is consistent with Goal 1, Policy 4 of the County's General Plan Safety Element, which states, "To encourage development of programs and practices which incorporate crime prevention methods, techniques, and experience into the planning process."[59] The proposed project would promote proactive recidivism avoidance methods and therefore would be consistent with this provision of the County's General Plan Safety Element. Further, the proposed project would be consistent with California Government Code sections 26600 (reentry programs) and 27771 (probation supervision).

City of Orange General Plan. Because the project site is located within the City, land uses within the project site would be subject to the City's General Plan Land Use Element. The project site is designated for Public Facilities and Institutions (PFI) and General Commercial (GC) land uses in the City General Plan Land Use Element.[60] It should be noted that, near the western boundary of the project site, a portion of West Metropolitan Drive planned for roadway improvements under the proposed project overlaps with the Urban Mixed-Use (UMIX) land use designation. However, the only improvement proposed in this portion of the project site is restriping of the eastbound left turn lane, which would maintain the existing roadway use. Further, because this land use designation is located on an existing roadway, it is not considered relevant for land use and planning analysis under the proposed project..

The PF/I land use designation provides for several types of public, quasi-public, and institutional land uses, including schools, colleges and universities, City and County facilities, hospitals, and major utility easements and properties. This land use designation includes service organizations and housing related institutional uses, such as dormitories, employee housing, assisted living, convalescent homes, and skilled nursing facilities. The GC land use provides for a range of retail and service commercial uses and professional offices.

The overall Workforce Reentry Facility would be run by the County as a public institution, consistent with the PF/I land use designation. As discussed in Section 3.0, Project Description, of this Draft IS/MND, the proposed project would include a vocational/office building to train program participants in various career types. In addition, the project also proposes a retail/culinary building to host additional training programs, but the retail stalls provided in this building would also be open for the public to purchase goods and services offered under this program. These land uses would be consistent with the intentions of the GC land use. As such, land uses within the project site under the proposed project would be consistent with the applicable City of Orange General Plan land use designations. Further, the proposed off-site

[59] County of Orange. 2012b. County of Orange General Plan Safety Element. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/40234.pdf (accessed January 16, 2025).

[60] City of Orange. 2015. City of Orange General Plan Land Use Element. December. Website: https://www.cityoforange.org/home/show publisheddocument/208/637698172555630000 (accessed January 16, 2025).

improvements to The City Drive South and West Metropolitan Drive would not result in any land use changes.

City of Orange Zoning Code. According to the City's Zoning Code, the project site is currently zoned as Public Institution (P-I) and Limited Business (C-1). The P-I zoning district is intended to accommodate a wide range of public and quasi-public uses that need special consideration and may accommodate housing and privately operated medical and office activities. The C-1 zoning district permits lower intensity office, general retail, and service commercial businesses. As previously stated, the overall Workforce Reentry Center would operate as a public institution and would include a public-facing commercial retail element. As such, under the proposed project, land uses within the project site would remain consistent with the applicable City Zoning Code designation. Further, the proposed off-site improvements to The City Drive South and West Metropolitan Drive would not result in any zoning changes.

Orange County Community Corrections Integrated Services 2025 Vision Report. The Orange County Community Corrections Partnership is a multidisciplinary group consisting of representatives from Orange County Probation, Orange County Community Resources, Orange County Health Care Agency, Orange County Office of the Public Defender, District Attorney, OC Sheriff, and community-based organizations, with the mission of prioritizing community safety whilst meeting needs of adult individuals involved in the criminal justice system or other County systems of care.[61] In 2019, the OCCP published the Integrated Services 2025 Vision document, which outlines action items, targets, and outcomes to serve as references throughout the decision-making process pertaining to corrections and correctional facilities. The 2025 Vision was adopted by the County Board of Supervisors on October 22, 2019.

The 2025 Vision document lists Strategic Priorities that are critical to achieving the County's overarching goals. Strategic Priority 4.1 states, "Establish a Reentry System to Provide for Successful Integration".[62] The description of this Strategic Priority specifically notes that very few transitional housing beds are available within the County, and that the main goal of this Strategic Priority is to "design and build an impactful reentry system." The proposed project would deliver on this Strategic Priority by providing transitional housing within the same facility as vocational training programs designed to encourage a successful transition from incarceration to the workforce. As such, the proposed project would be consistent with the goals and policies set forth in the County's 2025 Vision document.

Summary. Development of the proposed project would be limited to the project site and does not propose changes to land uses within any surrounding parcels, with the exception of minor roadway improvements to The City Drive South and West Metropolitan Drive to accommodate safe vehicular access to the project site. As such, implementation of the proposed project would not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant, and no mitigation is required.

[61] Public Safety Realignment – AB109/PCS. Website: https://ocprobation.ocgov.com/bureaus/adult-operations/ab109pcs#:~:text=The%20Orange%20County%20Community%20Corrections,clients%20to%20necessary%20reentry%20resources (accessed January 16, 2025).

[62] County of Orange. 2019. Community Corrections Report. Website: https://voiceofoc.org/wp-content/uploads/2019/10/OC-Integrated-Services-plan.pdf (accessed January 16, 2025).

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4.16 *Mineral Resources*

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

Question 4.16 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?

Response to Question 4.16 a):

No Impact. Minerals are defined as naturally occurring elements or compounds, or groups of elements and compounds, formed from inorganic processes and organic substances including, but not limited to, coal, peat, and oil-bearing rock, but excluding geothermal resources, natural gas, and petroleum by the United States Geological Survey.[63]

The California DOC, California Geologic Survey (CGS), and the California State Mining and Geology Board are required by the Surface Mining and Reclamation Act of 1974 to categorize lands into four Aggregate and Mineral Resource Zones (MRZs). These MRZs classify lands that contain significant regional or Statewide mineral deposits. Jurisdictions are mandated by the State to incorporate MRZs into their General Plans. According to the City's General Plan Natural Resources Element, many significant mineral resources are present within the City. These mineral resource deposits are limited to sand and gravel resources. Sand and gravel are aggregate resources, a primary component in cement concrete. These resources are important to the region's economy as they are widely used in the construction industry.[64]

The proposed project is located in the southwestern portion of the City, just west of the Santa Ana River. The City's General Plan Land Use Element designates areas in the northeastern portion of the City as a Resource Area for the purpose of conserving mineral resources and allowing mining activity. City-designated Resource Areas are located along East Santiago Canyon Road, approximately six miles east of the project site. The County's General Plan Resources Element designates portions of the Santa Ana River, Santiago Creek, San Juan Creek, Arroyo Trabuco, and other areas as Resource Areas in the region. As such,

63 United States Geological Survey (USGS). n.d.-b. What is the difference between a rock and a mineral? Website: https://www.usgs gov/faqs/what-difference-between-rock-and-mineral (accessed January 21, 2025).

64 City of Orange General Plan. n.d. Natural Resources Element. Mineral Resources. Website: https://www.cityoforange.org/home/showpublisheddocument/210/637698172559270000 (accessed January 21, 2025).

the project site is not located within or adjacent to any designated mineral resource areas of value to the region or State. Therefore, the proposed project would not result in the loss of availability of a known mineral that would be of value to the region and the residents of the State. No impact would occur, and no mitigation is required.

Question 4.16 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?

Response to Question 4.16 b):

No Impact. The City has been characterized by numerous state-designated MRZs and contributed to the gravel industry, but most of the City's mineral resources have since been exhausted, and the MRZs declassified because of completed mining activity or urban development.[65] As described above, there are several mineral resource areas located within the City. However, none of these resource areas are located within or adjacent to the project site. The proposed project would not 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 because it is not located within or adjacent to City- or State-designated resource areas. No impact would occur, and no mitigation is required.

[65] City of Orange. n.d.-c. General Plan. Natural Resources Element. Mineral Resources. Website: https://www.cityoforange.org/home/ showpublisheddocument/210/637698172559270000 (accessed January 21, 2025).

4.17 *Noise*

Would the project result in:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The following analysis is based upon information presented in the Noise Analysis Data prepared for the proposed project by LSA in May 2025. This document is included within this IS/MND as Appendix I.

The noise surveys were conducted prior to the demolition of the animal shelter structures to grade and the removal of vegetation that previously existed on the project site. Demolition to grade occurred in April and May 2025, while below-grade demolition of footings, utilities, and pavement would occur under the proposed project. Therefore, although analysis presented in Appendix I may include ambient noise associated with the animal shelter structures, these features are no longer present. For purposes of the environmental analysis in this IS/MND the existing condition of the project site is a vacant disturbed lot.

Technical Background. The following provides an overview of the characteristics of sound, fundamentals of vibration, and noise and vibration regulatory settings that apply to the proposed project.

Characteristics of Sound. To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations (or cycles per second) of a wave, resulting in the tone's range from high to low. Loudness is the strength of a sound and describes a noisy or quiet environment; it is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with

the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound. Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike units of measurement that use a linear scale (e.g., inches or pounds), decibels use a scale based on powers of 10.

For example, 10 decibels (dB) is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty decibels (30 dB) represents 1,000 times as much acoustic energy as 0 dB. The decibel scale increases as the square of the change, representing the sound-pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 A-weighted decibels (dBA) (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source, such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases 4.5 dB for each doubling of distance.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in California are L_{eq} and the Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on dBA. CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during relaxation hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

Other noise rating scales of importance, when assessing the annoyance factor, include the maximum instantaneous noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis are specified in terms of L_{max} for short-term noise impacts. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise.

Another noise scale often used together with L_{max} in noise ordinances for enforcement purposes is noise standards in terms of percentile noise levels. For example, the L_{10} noise level represents the noise level

exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half of the time the noise level exceeds this level, and half of the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, L_{eq} and L_{50} are approximately the same.

Noise impacts can be described in three categories. The first category, audible impacts, refers to increases in noise levels noticeable to humans. Audible increases in noise levels generally involve a change of 3 dB or greater because that level has been found to be barely perceptible in exterior environments. The second category, potentially audible impacts, refers to a change in the noise level between 1 and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category involves changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

Physiological Effects of Noise. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 160 to 165 dBA will potentially result in dizziness or loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less-developed areas. Table 4.17.A lists definitions of acoustical terms, and Table 4.17.B shows common sound levels and their noise sources.

Fundamentals of Vibration. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors where the motion may be discernible. However, without the effects associated with the shaking of a building, there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Building damage is not a factor for normal operation and construction activities with the occasional exception of blasting and pile driving during construction.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Impacts with ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet (Federal Transit Administration [FTA] *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual).[66] When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects, it is assumed that the

[66] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual.* FTA Report No. 0123. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed May 2, 2025).

roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction activities have the potential to result in ground-borne vibration that could be perceptible and annoying. Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path usually will be greater than ground-borne noise.

Table 4.17.A: Definitions of Acoustical Terms

Term	Definition
Decibel, dB	A unit of noise level that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, Hz	Of a function periodic in time, the number of times that the quantity repeats itself in 1 second (i.e., number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. (All sound levels in this report are A-weighted unless reported otherwise.)
L_2, L_8, L_{50}, L_{90}	The fast A-weighted noise levels that are equaled or exceeded by a fluctuating sound level 2 percent, 8 percent, 50 percent, and 90 percent of a stated time period.
Equivalent Continuous Noise Level, L_{eq}	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dB to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level, L_{dn}	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
L_{max}, L_{min}	The maximum and minimum A-weighted sound levels measured on a sound level meter during a designated time interval using fast-time averaging.
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time; usually a composite of sound from many sources from many directions, near and far; no particular sound is dominant.
Intrusive	The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, time of occurrence, and tonal or informational content, as well as the prevailing ambient noise level.

Source: *Handbook of Acoustical Measurements and Noise Control* (Harris 1991).

Table 4.17.B: Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	—
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	—
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	—
Near-Freeway Auto Traffic	70	Moderately Loud	Reference Level
Average Office	60	Quiet	½ as loud
Suburban Street	55	Quiet	—
Light Traffic; Soft Radio Music in Apartment	50	Quiet	¼ as loud
Large Transformer	45	Quiet	—

Table 4.17.B: Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Average Residence without Stereo Playing	40	Faint	⅛ as loud
Soft Whisper	30	Faint	—
Rustling Leaves	20	Very Faint	—
Human Breathing	10	Very Faint	Threshold of Hearing
—	0	Very Faint	—

Source: Compiled by LSA (2004).

Ground-borne vibration has the potential to disturb people as well as damage buildings. As stated in the FTA Manual, although it is very rare for ground-borne vibration to cause even cosmetic building damage, there is potential for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage nearby buildings. Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). RMS is best for characterizing human response to building vibration, and PPV is used to characterize the potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration. Vibration velocity level in decibels is defined as:

$$L_V = 20 \log_{10} [V/V_{ref}]$$

where L_V is the velocity in decibels (VdB), "V" is the RMS velocity amplitude, and "V_{ref}" is the reference velocity amplitude, or 1 x 10-6 inches per second (in/sec) used in the United States.

Regulatory Setting

Federal Guidelines

Federal Transit Administration. The construction noise criteria included in the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* (2018) was used to evaluated potential construction noise impacts. In addition, any noise sources associated with construction would be prohibited from taking place between 8:00 p.m. to 7:00 a.m. on weekdays and Saturdays, and all day on Sundays, in compliance with the County Noise Ordinance (County of Orange Municipal Code Section 4-6-7). Table 4.17.C shows the FTA's Detailed Assessment Daytime Construction Noise Criteria based on the composite noise levels for each construction phase.

Table 4.17.C: Detailed Assessment Daytime Construction Noise Criteria

Land Use	Daytime 1-hour L_{eq} (dBA)
Residential	80
Commercial	85
Industrial	90

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
dBA = A-weighted decibels
Leq = equivalent continuous sound level

Vibration standards included in the FTA *Transit Noise and Vibration Impact Assessment Manual* (2018) were used to evaluate vibration impacts because the County does not have vibration standards. Table 4.17.D provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building, while Table 4.17.E lists the potential vibration building damage criteria associated with construction activities.

Table 4.17.D: Interpretation of Vibration Criteria for Detailed Analysis

Land Use	Maximum L_v (VdB)[1]	Description of Use
Workshop	90	Vibration that is distinctly felt. Appropriate for workshops and similar areas not as sensitive to vibration.
Office	84	Vibration that can be felt. Appropriate for offices and similar areas not as sensitive to vibration.
Residential Day	78	Vibration that is barely felt. Adequate for computer equipment and low-power optical microscopes (up to 20×).
Residential Night and Operating Rooms	72	Vibration is not felt, but ground-borne noise may be audible inside quiet rooms. Suitable for medium-power microscopes (100×) and other equipment of low sensitivity.

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] As measured in ⅓-octave bands of frequency over the frequency range 8 to 80 Hertz.
FTA = Federal Transit Administration
L_V = velocity in decibels
VdB = vibration velocity decibels

Table 4.17.E: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Nonengineered-timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
FTA = Federal Transit Administration
in/sec = inches per second
PPV = peak particle velocity

State Guidelines

California Department of Transportation. Vibration standards included in the California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual (Caltrans Manual) are used in this analysis for ground-borne vibration impacts on human annoyance and building damage. The criteria for environmental impact from ground-borne vibration are based on the maximum levels for a single event and the RMS vibration level. Table 4.17.F provides the criteria for assessing the potential for annoyance from vibration levels. Table 4.17.G lists the potential vibration building damage criteria associated with construction activities, as suggested in the Caltrans Manual.

Table 4.17.F: Vibration Annoyance Potential Criteria

Human Response	Vibration Level (RMS in/sec)
Barely perceptible	0.01
Distinctly perceptible	0.04
Strongly perceptible	0.10
Severe	0.40

Source: *Table 20, Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).
in/sec = inch/inches per second RMS = root-mean-square

Table 4.17.G: Construction Vibration Damage Potential Criteria

Structure / Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
New residential structures	0.50
Modern industrial / commercial buildings	0.50

Source: Table 19, *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).
in/sec = inch/inches per second
PPV = peak particle velocity

Local Regulations

City of Orange General Plan Noise Element. As previously stated, while the project site is owned by the County, it is located within the City. The City's General Plan Noise Element[67] has established noise standards from transportation sources for various land uses and has goals and policies to meet the City's noise-related goals. The City's noise standards from transportation and stationary sources are shown in Tables 4.17.H and Table 4.17.I. As shown in Table 4.17.H, the City has established an exterior noise standard of 65 dBA CNEL for single- and multi-family residential uses. Applicable goals and policies for the project are listed below:

- **Goal 7.0:** Minimize construction, maintenance vehicle, and nuisance noise in residential areas and near noise-sensitive land uses.
    - **Policy 7.1:** Schedule City maintenance and construction projects so that they generate noise during less sensitive hours.
    - **Policy 7.2:** Require developers and contractors to employ noise minimizing techniques during construction and maintenance operations.
    - **Policy 7.3:** Limit the hours of construction and maintenance operations located adjacent to noise-sensitive land uses.
    - **Policy 7.4:** Encourage limitations on the hours of operations and deliveries for commercial, mixed-use, and industrial uses abutting residential zones.

Table 4.17.H: Maximum Allowable Noise Exposure-Transportation Sources

Land Use		Noise Level (dBA CNEL)	
Designations	**Uses**	**Interior**	**Exterior**
Estate Low Density Residential Low Density Residential Low Medium Density Residential	Single-family, duplex, and multiple-family	45	65
	Mobile home park	N/A	65
Medium Density Residential Neighborhood Mixed-use Neighborhood Office Professional Old Towne Mixed-use General Commercial	Single-family	45	65
	Mobile home park	N/A	65
	Multiple-family, mixed-use	45	65
	Transient lodging—motels, hotels	45	65
	Sports arenas, outdoor spectator sports	N/A	N/A

[67] City of Orange. 2015d. Orange General Plan Noise Element. December. Website: https://www.cityoforange.org/home/showpublisheddocument/212/637698172563500000 (accessed January 31, 2025).

Table 4.17.H: Maximum Allowable Noise Exposure-Transportation Sources

Land Use		Noise Level (dBA CNEL)	
Designations	**Uses**	**Interior**	**Exterior**
Yorba Commercial Overlay Urban Mixed-use Urban Office Professional	Auditoriums, concert halls, amphitheaters	45	N/A
	Office buildings, business, commercial and professional	50	N/A
Light Industrial Industrial	Manufacturing, utilities, agriculture	N/A	N/A
Public Facilities and Institutions	Schools, nursing homes, day care facilities, hospitals, convalescent facilities, dormitories	45	65
	Government Facilities—offices, fire stations, community buildings	45	N/A
	Places of Worship, Churches	45	N/A
	Libraries	45	N/A
	Utilities	N/A	N/A
	Cemeteries	N/A	N/A
Recreation Commercial	Playgrounds, neighborhood parks	N/A	70
Open Space Open Space-Park Open Space-Ridgeline Resource Area	Golf courses, riding stables, water recreation, cemeteries	N/A	N/A

Source: City of Orange General Plan Noise Element (2015).

[1] Interior habitable environment excludes bathrooms, closets and corridors.

[2] Exterior noise level standard to be applied at outdoor activity areas; such as private yards, private patio or balcony of a multi-family residence. Where the location of an outdoor activity area is unknown or not applicable, the noise standard shall be applied inside the property line of the receiving land use.

[3] Interior noise standards shall be satisfied with windows in the closed position. Mechanical ventilation shall be provided per Uniform Building Code (UBC) requirements.

[4] Within the Urban Mixed-Use, Neighborhood Mixed-Use, Old Towne Mixed-use, and Medium Density Residential land use designations, exterior space standards apply only to common outdoor recreational areas.

[5] Within Urban Mixed-Use and Medium Density Residential land use designations, exterior noise levels on private patios or balconies located within 250 feet of freeways (I-5, SR-57, SR-55, SR-22, or SR-241) and Smart Streets and Principal Arterials identified in the Circulation & Mobility Element that exceed 70 dB should provide additional common open space.

N/A = Not Applicable to specified land use category or designation

Table 4.17.I: Maximum Allowable Noise Exposure-Stationary Sources

Land Use	Time Period	Noise Level (dBA)	
		L_{eq}	L_{max}
Residential	7:00 a.m. to 10:00 p.m.	55	70
	10:00 p.m. to 7:00 a.m.	50	65

Source: City of Orange Municipal Code (2024).

Notes:

[1] These standards apply to new or existing noise sensitive land uses affected by new or existing non-transportation noise sources, as determined at the outdoor activity area of the receiving land use. However, these noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).

[2] Each of the noise levels specified above should be lowered by 5 dB for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. Such noises are generally considered by residents to be particularly annoying and are a primary source of noise complaints. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).

[3] No standards have been included for interior noise levels. Standard construction practices that comply with the exterior noise levels identified in this table generally result in acceptable interior noise levels.

[4] The City may impose noise level standards which are more or less restrictive than those specified above based upon determination of existing low or high ambient noise levels. If the existing ambient noise level exceeds the standards, then the noise level standards shall be increased at 3 dB increments to encompass the ambient environment. Noise level standards incorporating adjustments for existing ambient noise levels shall not exceed a maximum of 70 dB L_{eq}.

In addition to the maximum allowable noise level standards outlined in Tables 4.17.H and 4.17.I, the City has established the following increases in ambient noise levels for the analysis of noise impacts and determining appropriate mitigation under CEQA:

- Where the existing ambient noise level is less than 65 dBA, a project-related permanent increase in ambient noise levels of 5 dBA CNEL or greater.

- Where the existing ambient noise level is greater than 65 dBA, a project-related permanent increase in ambient noise levels of 3 dBA CNEL or greater.

City of Orange Municipal Code. Section 8.24.040 of the City's Municipal Code established exterior noise limits (shown in Table 4.17.I) that apply to residential property within the City.

Section 8.24.050(E) of the City's Municipal Code exempts noise sources associated with construction, repair, remodeling, or grading of any real property between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday, or between the hours of 9:00 a.m. to 8:00 p.m. on Sundays and federal holidays.

Existing Setting

Surrounding Land Uses. Land uses surrounding the project site include the Santa Ana River to the east, the Theo Lacy Facility to the north, a vacant strip of State-owned land and State Route 22 (SR-22) to the south, and the Outlets at Orange mall with several restaurants across The City Drive South to the west. The closest existing residential uses are located to the southeast and southwest of the project site beyond SR-22. In addition, potential future residential uses (existing office use) are located directly south of the project site, beyond SR-22.

Existing Noise Environment. The primary existing noise sources in the project area are transportation facilities. Traffic on State Route 22 (SR-22), The City Drive South and other roadways with the project vicinity is a steady source of ambient noise in the project vicinity.

Ambient Noise Level Measurements. Three long-term (24-hour) noise level measurements were conducted from October 15 to October 17, 2024, using Larson Davis Spark 706RC dosimeters to document the existing noise environment within the project area. Table 4.17.J summarizes the results of the long-term noise level measurements along with a description of the measurement locations and noise sources that occurred during the measurements. As shown in Table 4.17.J, daytime noise levels across all three monitoring locations ranged from 55.2 to 70.6 dBA L_{eq} and nighttime noise levels ranged from 57.3 to 68.4 dBA L_{eq}. The calculated CNEL levels at LT-1, LT 2, and LT-3 were 70.6, 70.5, and 71.8 dBA, respectively. The long-term noise level measurement survey sheets along with the hourly Leq results are provided in Appendix I of this IS/MND. Figure 4.17-1 shows the long-term monitoring locations.

Table 4.17.J: Long-Term Ambient Noise Monitoring Results

Monitoring No.	Location Description	Noise Levels (dBA)			Noise Sources
		Daytime[1]	Nighttime[2]	CNEL	
		L_{eq}	L_{eq}		
LT-1	591 The City Drive South. At the corner of the fence on the project site near the intersection of The City Drive and Metropolitan Drive. Approximately 120 feet from The City Drive centerline.	63.9-69.8	57.3-67.5	70.6	Traffic on SR-22, The City Drive, and Metropolitan Drive.

Table 4.17.J: Long-Term Ambient Noise Monitoring Results

Monitoring No.	Location Description	Noise Levels (dBA)			Noise Sources
		Daytime[1]	Nighttime[2]	CNEL	
		L_{eq}	L_{eq}		
LT-2	In the parking lot east of the Theo Lacy recreation yard. Approximately 540 feet north of SR-22 centerline and 700 ft east of The City Drive centerline.	55.2-70.6	57.3-68.2	70.5	Traffic on SR-22 and faint traffic on I-5.
LT-3	591 The City Drive South. On a light pole near the center of the parking lot. Approximately 315 feet from SR-22 centerline and 130 feet from The City Drive centerline.	64.0-70.3	58.4-68.4	71.8	Traffic on SR-22, The City Drive, and Metropolitan Drive.

Source: Compiled by LSA Associates, Inc. (2025).

[1] Daytime = Hours between 7:00 a.m. and 10:00 p.m.

[2] Nighttime = Hours between 10:00 p.m. and 7:00 a.m.

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibel(s)

L_{eq} = equivalent continuous sound level



LSA

LEGEND

Project Site Boundary

LT-X Long-Term Noise Monitoring Location

FIGURE 4.17-1

0 60 120

FEET

SOURCE: Google Earth 2025

County of Orange Workforce Reentry Center Project

Noise Monitoring Locations

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Question 4.17 a): Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Response to Question 4.17 a): Less than Significant with Mitigation Incorporated.

Short-Term Construction Noise Impacts. Two types of short-term noise impacts would occur during construction of the proposed project. The first type would be from construction crew commutes and the transport of construction equipment and materials to the project limits and would incrementally raise noise levels on roadways leading to the site. The pieces of construction equipment for construction activities would move on site, would remain for the duration of each construction phase, and would not add to the daily traffic volume in the project vicinity. The results of the California Emissions Estimator Model (CalEEMod) (Version 2022.1) contained in Appendix A of this IS/MND indicate that the building construction phase would generate the most trips out of all of the construction phases and have an acoustical equivalent traffic volume of 3,552 passenger car equivalent vehicles on The City Drive. The City Drive has an existing ADT volume of 20,590 near the project site based on the Workforce Re-Entry Center Traffic Impact Analysis.[68] Based on the information above, construction-related traffic would increase noise levels by up to 0.7 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related noise impacts associated with worker commutes and equipment transport to the project site would be less than significant. No mitigation measures are required.

The second type of short-term noise impact is related to noise generated from construction activities. Construction is performed in discrete phases, each of which has its own mix of equipment and, consequently, its own noise characteristics. The proposed project anticipates demolition, site preparation, grading, building construction, paving, architectural coating, and utilities and trenching phases of construction. These various sequential phases change the character of the noise generated on a project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.17.K lists the L_{max} recommended for noise impact assessments for typical construction equipment included in the FHWA Highway Construction Noise Handbook (2006), based on a distance of 50 feet between the equipment and a noise receptor.

Table 4.17.L lists the anticipated construction equipment for each construction phase based on the CalEEMod (Version 2022.1) results contained in Appendix A of this IS/MND. Table 4.17.L shows the combined noise level at 50 ft from all of the equipment in each phase and the L_{eq} noise level for each equipment at 50 ft based on the quantity, reference L_{max} noise level at 50 ft, and the acoustical usage factor. As shown in Table 4.17.L, construction noise levels would reach up to 91.4 dBA L_{eq} at a distance of 50 ft.

Table 4.17.K: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor[1] (%)	Maximum Noise Level (L_{max}) at 50 ft[2]
Backhoe	40	80
Compactor (ground)	20	80

[68] Linscott, Law & Greenspan (LLG). 2025. *Workforce Re-Entry Center Traffic Impact Analysis*. April 11.

Table 4.17.K: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor[1] (%)	Maximum Noise Level (L_{max}) at 50 ft[2]
Compressor	40	80
Crane	16	85
Dozer	40	85
Drill Rig Truck	20	84
Dump Truck	40	84
Excavator	40	85
Flatbed Truck	40	84
Man Lift (Forklift)	20	85
Front-End Loader	40	80
Generator	50	82
Generator (<25KVA, VMS signs)	50	70
Grader	40	85
Jackhammer	20	85
Pavement Scarifier	20	85
Paver	50	85
Pickup Truck	40	55
Pneumatic Tools	50	85
Pump	50	77
Rock Drill	20	85
Roller	20	85
Scraper	40	85
Tractor	40	84
Vacuum Excavator (Vac-truck)	40	85
Vibratory Pile Driver	20	95
Welder/Torch	40	73

Source: *FHWA Highway Construction Noise Handbook,* Table 9.1 (FHWA 2006).
Note: The noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the CA/T program to be consistent with the City of Boston, Massachusetts, Noise Code for the "Big Dig" project.
CA/T = Central Artery/Tunnel
FHWA = Federal Highway Administration
ft = foot/feet
L_{max} = maximum instantaneous noise level

Table 4.17.L: Summary of Construction Phase, Equipment, and Noise Levels

Construction Phase	Construction Equipment	Quantity	Reference Noise Level at 50 ft (dBA L_{max})	Acoustical Usage Factor[1] (%)	Noise Level at 50 ft (dBA L_{eq})	Combined Noise Level at 50 ft (dBA L_{eq})
Demolition	Crushing/Processing Equipment[2]	1	85	20	78	81.0
	Jackhammer	1	85	20	78	
Site Preparation	Compressor (air)	1	80	40	76.0	85.9
	Compactor (ground)	1	80	20	73.0	
	Dump Truck	1	84	40	80.0	
	Excavator	1	85	40	81.0	
	Front End Loader	1	80	40	76.0	
	Jackhammer	1	85	20	78.0	
Grading	Dump Truck	1	84	40	80.0	91.4
	Excavator	1	85	40	81.0	
	Generator	1	82	50	79.0	

Table 4.17.L: Summary of Construction Phase, Equipment, and Noise Levels

Construction Phase	Construction Equipment	Quantity	Reference Noise Level at 50 ft (dBA L_{max})	Acoustical Usage Factor[1] (%)	Noise Level at 50 ft (dBA L_{eq})	Combined Noise Level at 50 ft (dBA L_{eq})
	Man Lift	1	85	20	78.0	
	Front End Loader	2	80	40	79.0	
	Vacuum Excavator (Vac-truck)	1	85	40	81.0	
	Compressor (air)	1	80	40	76.0	
	Drill Rig Truck	1	84	20	77.0	
	Compactor (ground)	1	80	20	73.0	
	Jackhammer	1	85	20	78.0	
	Vibratory Pile Driver	1	95	20	88.0	
Building Construction	Generator	2	82	50	82.0	88.3
	Pumps	2	77	50	77.0	
	Man Lift	3	85	20	82.8	
	Compressor (air)	4	80	40	82.0	
	Backhoe	1	80	40	76.0	
	Compactor (ground)	1	80	20	73.0	
	Crane	1	85	16	77.0	
Paving	Paver	1	85	50	82.0	85.9
	Roller	1	85	20	78.0	
	Man Lift	1	85	20	78.0	
	Dump Truck	1	84	40	80.0	
Architectural Coating	Dump Truck	1	84	40	80.0	82.1
	Pavement Scarafier	1	85	20	78.0	
Utilities/Trenching	Dump Truck	1	84	40	80.0	86.2
	Excavator	1	85	40	81.0	
	Man Lift	1	85	20	78.0	
	Excavator	1	85	40	81.0	

Source: Compiled by LSA Associates, Inc. (2025).

[1] The acoustical usage factor is the percentage of time during a construction noise operation that a piece of construction equipment operates at full power.

[2] It is assumed that noise generated from crushing/processing equipment would be similar to a rock drill.

dBA = A-weighted decibels L_{eq} = equivalent continuous sound level

ft = foot/feet L_{max} = maximum instantaneous noise level

Table 4.17.M shows that construction noise levels at the closest property line from the center of the project site would reach 78.3 dBA L_{eq}. Although noise generated by project construction activities would be higher than the ambient noise levels and may result in a temporary increase in the ambient noise levels, construction noise would stop once project construction is completed. Also, construction-related noise levels would be below the FTA noise level standards of 80, 85, and 90 dBA L_{eq} for residential, commercial, and industrial uses, respectively. Pursuant to Section 8.24.050 of the City's Municipal Code, construction activities shall be limited to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday and between the hours of 9:00 a.m. and 8:00 p.m. on Sunday or a federal holiday. The implementation of construction hour limits, as summarized in Regulatory Compliance Measure (RCM) N-1, would minimize disturbance to nearby land uses. Therefore, noise generated from project construction activities would be less than significant. No mitigation is required.

Table 4.17.M: Construction Noise Levels

Land Use	Direction	Reference Noise Level at 50 ft (dBA L_{eq})	Distance (ft)	Distance Attenuation (dBA)	Noise Level (dBA L_{eq})
Theo Lacy Facility	North	91.4	225	13.1	78.3
Industrial	East	91.4	910	25.2	66.2

Table 4.17.M: Construction Noise Levels

Land Use	Direction	Reference Noise Level at 50 ft (dBA L_{eq})	Distance (ft)	Distance Attenuation (dBA)	Noise Level (dBA L_{eq})
Residence	Southeast	91.4	980	25.8	65.6
Office/Residence	South	91.4	585	21.4	70.0
Residence	Southwest	91.4	1,120	27.0	64.4
Commercial	West	91.4	430	18.7	72.7

Source: Compiled by LSA Associates, Inc. (2025).
dBA = A-weighted decibels
ft = foot/feet
L_{eq} = equivalent continuous sound level

Long-Term Operational Noise Impacts. The FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to evaluate traffic-related noise conditions along roadways in the project vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry, to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resulting noise levels are weighted and summed over 24-hour periods to determine the CNEL values. The Existing (2025) and Opening Year (2028), and Buildout Year (2050) without and with project ADT volumes were derived from the Workforce Re-Entry Center Traffic Impact Analysis.[69] The standard vehicle mix for Southern California roadways was used for traffic on these roadway segments. Tables 4.17.N, 4.17.O, and 4.17.P list the traffic noise levels for the Existing (2025), Opening Year (2028), and Buildout Year (2050) without and with project scenarios, respectively. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. The specific assumptions used in developing these noise levels and the model printouts are provided in Appendix I of this IS/MND.

Tables 4.17.N, 4.17.O, and 4.17.P show that project-related traffic would increase noise by up to 0.1 dBA. This noise level increase would not be perceptible to the human ear in an outdoor environment. Therefore, traffic noise from project-related traffic on off-site sensitive receptors would be less than significant. No noise mitigation is required.

[69] Linscott, Law & Greenspan (LLG). 2025. *Workforce Re-Entry Center Traffic Impact Analysis*. May 7.

Table 4.17.N: Existing (2025) Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions (dBA)
The City Drive North of Outlet Drive	20,590	< 50	93	178	64.5	20,730	< 50	93	178	64.5	0.0
The City Drive Between Outlet Drive and Metropolitan Drive	23,190	< 50	101	193	64.8	23,320	< 50	102	193	64.8	0.0
The City Drive Between Metropolitan Drive and SR-22 EB Ramps	22,815	< 50	93	187	65.5	23,305	< 50	94	189	65.6	0.1
The City Drive South of SR-22 EB Ramps	16,160	< 50	76	149	64.2	16,300	< 50	76	150	64.2	0.0
Metropolitan Drive West of The City Drive	10,760	< 50	< 50	89	61.7	11,060	< 50	< 50	91	61.8	0.1

Source: Compiled by LSA (2025).
Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
EB = Eastbound
ft = foot/feet
SR-22 = State Route 22

Table 4.17.O: Opening Year (2028) Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions (dBA)
The City Drive North of Outlet Drive	26,830	< 50	107	210	65.6	26,970	< 50	107	210	65.6	0.0
The City Drive Between Outlet Drive and Metropolitan Drive	29,510	< 50	114	224	65.8	29,640	< 50	115	224	65.8	0.0
The City Drive Between Metropolitan Drive and SR-22 EB Ramps	28,515	< 50	105	216	66.5	29,005	< 50	106	218	66.5	0.0
The City Drive South of SR-22 EB Ramps	19,560	< 50	84	169	65.0	19,700	< 50	84	169	65.0	0.0
Metropolitan Drive West of The City Drive	13,160	< 50	< 50	101	62.6	13,460	< 50	< 50	103	62.7	0.1

Source: Compiled by LSA (2025).
Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
EB = Eastbound
ft = foot/feet
SR-22 = State Route 22

Table 4.17.P: Buildout Year (2050) Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase from Baseline Conditions (dBA)
The City Drive North of Outlet Drive	28,170	< 50	109	216	65.8	28,310	< 50	110	217	65.9	0.1
The City Drive Between Outlet Drive and Metropolitan Drive	31,860	< 50	119	235	66.2	31,990	< 50	119	235	66.2	0.0
The City Drive Between Metropolitan Drive and SR-22 EB Ramps	32,805	62	114	236	67.1	33,295	63	115	238	67.1	0.0
The City Drive South of SR-22 EB Ramps	21,550	< 50	89	179	65.4	21,690	< 50	89	180	65.4	0.0
Metropolitan Drive West of The City Drive	21,710	< 50	67	140	64.7	22,010	< 50	68	141	64.8	0.1

Source: Compiled by LSA (2025).
Note: Traffic noise within 50 ft of the roadway centerline should be evaluated with site-specific information.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
EB = Eastbound
ft = foot/feet
SR-22 = State Route 22

Long-Term Stationary Noise Impacts. The proposed project would include mechanical equipment such as rooftop heating, ventilation, and air conditioning (HVAC) units and exhaust fans. The HVAC equipment could operate 24 hours a day while exhaust fans would operate during specific times of the day. The City's General Plan Noise Element and Section 8.24.040 of the City's Municipal Code have stationary exterior noise limit of 55 dBA during daytime hours and 50 dBA during nighttime hours shown in Table 4.17.I that apply to residential properties. Mitigation Measure (MM) N-1 would require a memorandum prepared by an acoustical engineer during final design of the proposed project confirming that the HVAC equipment would comply with the City's daytime and nighttime exterior noise standard. With the implementation of Mitigation Measure N-1, noise levels generated by the HVAC equipment would be less than significant.

Long-Term On-Site Noise Impacts.

Table 4.17.Q shows the existing exterior noise level at the building facade for each of the proposed buildings from the Newson Brown Acoustics, LLC. on-site noise assessment, provided in Appendix I. The existing exterior noise level was adjusted to the buildout year (2050) with project conditions by adding 2 dBA (rounded up from 1.6 dBA) to the existing exterior noise level based on difference in noise levels between the two scenarios shown in Tables 4.17.N and 4.17.P. As shown in Table 4.17.O, an exterior-to-interior noise reduction of 21 dBA is needed for Buildings 1 and 2 (vocational and retail/culinary buildings) to meet the City's interior noise standard of 50 dBA CNEL for non-residential uses and an exterior-to-interior noise reduction of 29 dBA is needed for Building 3 (housing building) to meet the City's interior noise standard of 45 dBA CNEL for residential uses. To calculate and estimate the noise reduction provided by an exterior wall assembly, the transmission loss at the octave band frequencies for wall material by type is combined to provide an overall noise reduction. The rating of the wall and window or windows within the assembly will have a rating often referred to as a sound transmission class (STC) rating. The program INSUL was used to estimate the window ratings to ensure that compliance is achieved. Based on standard wall construction, the following elements make up the assumed exterior wall assembly:

- Corrugated Metal Panel Cladding System or Masonry Veneer;
- Weather Resistive Barrier (WRB);
- One layer of 5/8-inch thick exterior gypsum sheathing;
- One layer of 7/8-inch-thick exterior cement plaster assembly over metal lath; and
- Metal stud framing.

In addition to the wall construction details, information from Greenworld Windows, which is energy and sound rated, was used to determine window STC ratings. Based on a review of the project site plan and architectural plans for the Building 3 floor plans, the S1.2 unit was analyzed as it has the largest glass-to-exterior wall ratio. The calculations indicate that a minimum window STC rating of 30 or higher for habitable rooms (bedrooms, living rooms, and dining rooms) plus to addition of resilient channels to the wood stud frame would reduce interior levels to 45 dBA CNEL or below. For Buildings 1 and 2, standard construction and windows with a minimum STC of 30 would reduce interior noise levels to 45 dBA CNEL or below. The results of the INSUL model are shown in Appendix I. Should architectural details in the final design plans be less adequate than those assumed above, a supplemental memorandum may be required to confirm that interior noise levels are reduced to 45 dBA CNEL or below.

Table 4.17.Q: On-Site Noise Analysis

Building No.	Use	Existing Noise Level (dBA)	Adjustment (dBA)	Buildout Year (2050) with Project Noise Level (dBA)	Interior Noise Standard (dBA CNEL)	Noise Reduction Needed to Meet Interior Noise Standard (dBA)
1	Vocational	69	2	71	50	21
2	Retail/Culinary	69	2	71	50	21
3	Housing	72	2	74	45	29

Source: Compiled by LSA (2025).
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel

Regulatory Compliance Measure:

RCM N-1 **Construction Noise and Vibration.** The Construction Contractor shall limit construction activities to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday and between the hours of 9:00 a.m. and 8:00 p.m. on Sunday or a federal holiday. Construction is prohibited outside these hours (Section 8.24.050 of the City of Orange Municipal Code).

Mitigation Measure:

MM N-1 **Acoustical Memorandum.** Prior to the issuance of the final occupancy permit, a qualified acoustical consultant shall prepare a memorandum to demonstrate that noise from on-site HVAC equipment does not increase ambient noise levels by 3 dBA or more exceeding the City's daytime and nighttime noise limit of 55 dBA and 50 dBA, respectively, at the off-site residential properties.

Question 4.17 b): Generation of excessive groundborne vibration or groundborne noise levels?

Response to Question 4.17 b):

Less than Significant with Mitigation Incorporated.

Short-Term Construction Impacts. This construction vibration impact analysis discusses the level of human annoyance using vibration levels in RMS (VdB) and assesses the potential for building damage using vibration levels in PPV (in/sec). Vibration levels calculated in RMS velocity are best for characterizing human response to building vibration, whereas vibration levels in PPV are best for characterizing damage potential.

Table 4.17.R shows the reference vibration levels at a distance of 25 ft for each type of standard construction equipment from the Transit Noise and Vibration Impact Assessment Manual (FTA 2018). Project construction is expected to require the use of large bulldozers and loaded trucks which would generate ground-borne vibration levels of up to 0.089 in/sec PPV-max (0.062 in/sec PPV-RMS) and 0.076 in/sec PPV-max (0.053 in/sec PPV-RMS), respectively, when measured at 25 feet.

Table 4.17.R: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	Maximum PPV (in/sec)	RMS PPV (in/sec)[1]
Pile Driver (Impact), Typical	0.644	0.451
Pile Driver (Sonic), Typical	0.170	0.119
Vibratory Roller	0.210	0.147
Hoe Ram	0.089	0.062
Large Bulldozer[2]	**0.089**	**0.062**
Caisson Drilling	0.089	0.062
Loaded Trucks[2]	**0.076**	**0.053**
Jackhammer	0.035	0.025
Small Bulldozer	0.003	0.002

Sources: *Transportation and Construction Vibration Guidance Manual (Caltrans 2020).*
[1] RMS vibration velocity is 70 percent of the maximum PPV.
[2] Equipment shown in bold is expected to be used on site.
µin/sec = microinches per second
Caltrans = California Department of Transportation
ft = foot/feet
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels

The greatest vibration levels are anticipated to occur during the demolition, site preparation, and grading phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts normally occur within the buildings.

The formula for vibration transmission is provided below:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$$

Table 4.17.S lists the projected vibration levels from various construction equipment expected to be used from the center of the project site to the nearest buildings in the project vicinity. As shown in Table 4.17.S, the closest building from the center of the construction area is approximately 225 feet and would experience a vibration level of up to 0.006 in/sec PPV-RMS. This vibration level would not have the potential to result in community annoyance because vibration levels would not exceed the Caltrans annoyance threshold of 0.04 in/sec PPV-RMS. Other building structures that surround the project site would experience lower vibration levels because they are farther away.

Table 4.17.S: Potential Construction Vibration Annoyance

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft (in/sec [PPV-RMS])	Distance to Structure (ft)[1]	Vibration Level (in/sec [PPV-RMS])
Leo Lacy Facility	North	Large bulldozers	0.062	225	0.006
		Loaded trucks	0.053	225	0.005
Industrial	East	Large bulldozers	0.062	975	0.001
		Loaded trucks	0.053	975	0.001
Residence	Southeast	Large bulldozers	0.062	980	0.001
		Loaded trucks	0.053	980	0.001
Office (Planned Residences)	South	Large bulldozers	0.062	780	0.001
		Loaded trucks	0.053	780	0.001
Residence	Southwest	Large bulldozers	0.062	1,120	0.001
		Loaded trucks	0.053	1,120	0.001
Restaurant	West	Large bulldozers	0.062	475	0.002
		Loaded trucks	0.053	475	0.002

Source: Compiled by LSA (2025).
Note: The Caltrans annoyance threshold is 0.04 in/sec PPV-RMS.
[1] Distance from the center of the project site to the building structure.
Caltrans = California Department of Transportation
ft = foot/feet
in/sec = inches per second
PPV = peak particle velocity

Similarly, Table 4.17.T lists the projected vibration levels from various construction equipment expected to be used at the project construction boundary to the nearest buildings in the project vicinity. As shown in Table 4.17.T, the closest building from the project construction boundary is approximately 5 feet and would experience a vibration level of up to 0.523 PPV-Max (in/sec). This vibration levels would have the potential to result in building damage because the building is conservatively assumed to be an older residential structure, and the anticipated project-related vibration levels would exceed the Caltrans vibration damage threshold of 0.30 PPV (in/sec). The implementation of Mitigation Measure N-2 would restrict heavy construction equipment (e.g., large bulldozers and loaded trucks) or require the use of light construction equipment (e.g., small bulldozers and trucks) within 10 ft from all building structures, which would reduce construction vibration levels to 0.244 PPV-Max (in/sec). Other building structures that surround the project site would experience lower vibration levels because they are farther away. These structures are also conservatively assumed to be older residential structures. The anticipated project-related vibration levels, as presented in Table 4.17.T, would not exceed the Caltrans vibration damage threshold of 0.30 PPV (in/sec). Therefore, construction vibration impacts would be less than significant with the implementation of Mitigation Measure N-2.

Long-Term Operational Impacts. Operation of the proposed project would not generate vibration. In addition, vibration levels generated from project-related traffic on the adjacent roadways (The City Drive and other roadways in the project vicinity) are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration impacts from project-related operations would be less than significant. No mitigation measures are required.

Table 4.17.T: Potential Construction Vibration Damage

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft (in/sec [PPV-Max])	Distance to Structure (ft)[1]	Vibration Level (in/sec [PPV-Max])
Leo Lacy Facility	North	Large bulldozers	0.089	5	0.523
		Loaded trucks	0.076	5	0.446
Industrial	East	Large bulldozers	0.089	645	0.002
		Loaded trucks	0.076	645	0.002
Residence	Southeast	Large bulldozers	0.089	650	0.002
		Loaded trucks	0.076	650	0.002
Office (Planned Residences)	South	Large bulldozers	0.089	530	0.003
		Loaded trucks	0.076	530	0.003
Residence	Southwest	Large bulldozers	0.089	805	0.002
		Loaded trucks	0.076	805	0.002
Restaurant	West	Large bulldozers	0.089	145	0.013
		Loaded trucks	0.076	145	0.011

Source: Compiled by LSA (2025).
Note: The Caltrans building damage threshold for older residential structures is 0.30 PPV (in/sec).
[1] Distance from the project construction boundary to the building structure.
Caltrans = California Department of Transportation in/sec = inches per second
ft = foot/feet PPV = peak particle velocity

Mitigation Measure:

MM N-2 **Construction Equipment.** The Construction Contractor shall restrict heavy construction equipment (e.g., large bulldozers and loaded trucks) or require the use of light construction equipment (e.g., small bulldozers and trucks) within 10 ft from all building structures.

Question 4.17 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?

Response to Question 4.17 c).

No Impact. The closest airports to the project area are John Wayne Airport and Fullerton Municipal Airport, which are located approximately 7 miles south and 8 miles northwest of the project site, respectively. The project site is outside the 60 dBA CNEL noise contour of John Wayne Airport and Fullerton Municipal Airport based on the Airport Environs Land Use Plans for John Wayne Airport[70] and Fullerton Municipal Airport,[71] respectively. In addition, the proposed project is not located in the vicinity of a private airstrip. Therefore, the project would not expose people residing or working in the vicinity to aviation-related excessive noise levels, and no impact would occur.

[70] Orange County Airport Land Use Commission (OCALUC). 2008. Airport Environs Land Use Plan for John Wayne Airport. April 17. Website: https://files.ocair.com/media/2021-02/JWA_AELUP-April-17-2008.pdf?VersionId=cB0byJjdad9OuY5im7Oaj5aWaT1FS.vD (accessed May 2025).

[71] Orange County Airport Land Use Commission (OCALUC). 2019. Airport Environs Land Use Plan for Fullerton Municipal Airport. February 21. Website: https://files.ocair.com/media/2021-02/AELUP%20for%20FMA%2005092019.pdf (accessed May 2025).

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4.18 *Population and Housing*

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

Question 4.18 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)?

Response to Question 4.18 a):

Less Than Significant Impact. The proposed project includes the development of the County of Orange Workforce Reentry Center on a previously developed site that is currently vacant following the demolition of existing structures on site to grade in April and May 2025. The proposed project would introduce new institutional and commercial uses within the project site, under which adult individuals involved in the criminal justice system or other County systems of care would participate in a reentry program with supportive housing and vocational training on-site. Retail stalls are proposed within the retail/culinary building, where program participants would produce and sell goods to the public in order to learn hands-on production and retail skills. A supportive housing building is proposed on-site to house 52 program participants and two on-site managers. Therefore, a form of temporary housing is proposed for a currently underutilized parcel of land under the proposed project. The Workforce Reentry Center is intended to support adult individuals involved in the criminal justice system or other County systems of care, many who have come from the Collaborative Courts programs offered by the Superior Court of Orange County. The Collaborative Courts division provides a range of support services to participants to reduce recidivism and improve offender outcomes. It is likely that many individuals from the Collaborative Courts program in the County already reside in the County. As such, the proposed project's population would consist of program participants and staff who likely already reside in the local area. In addition, it is anticipated that new staff would be drawn from the existing local workforce and would not result in significant regional population shifts. The proposed project would also create temporary construction jobs that would also be expected to be filled by the local workforce in the County or surrounding areas.

The Growth Management Element of the City of Orange's 2010 General Plan accounts for a 27.5 percent increase in Orange's population between 2008 and 2030.[72] In 2010, Orange had a population of approximately 136,416.[73] According to the Growth Management Element, Orange's population is projected to increase to approximately 174,000 residents by 2030.[74] As of January 1, 2024, Orange had a population of 138,621 people.[75] Therefore, Orange has the capacity to accommodate the potential negligible population increase under the proposed project.

The Growth Management Element of the City's 2010 General Plan accounts for a 27.5 percent increase in the City's population between 2008 and 2030.[76] In 2010, the City had a population of approximately 136,416.[77] According to the Growth Management Element, City's population is projected to increase to approximately 174,000 residents by 2030.[78] As of January 1, 2024, the City had a population of 138,621 people.[79] Therefore, the City has the capacity to accommodate the potential negligible population increase under the proposed project.

The County's General Plan also contains a Growth Management Element. While the County's General Plan Growth Management Element does not contain specific population statistics,[80] the County's population as of 2024 was 3,150,835.[81] As such, similar to the City, the County has the capacity to accommodate the potential negligible increase in population under the proposed project.

SCAG, as the metropolitan planning organization for the six county Los Angeles metropolitan region, is responsible for preparing and maintaining the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), (Connect SoCal 2024[82]) which projects population growth over its planning horizon of 2050. Per Connect SoCal 2024, the County is projected to have a population of 3,439,000 by 2050. The County has the capacity to absorb the potential minimal increase in population associated with the proposed project.

The proposed project would include new utility connections to link the proposed buildings and features to existing large-scale infrastructure serving other land uses in the surrounding area. These connections

72 City of Orange General Plan. Growth Management Element. 2010. Website: https://www.cityoforange.org/home/showpublisheddocument/202/637698172544070000 (accessed January 23, 2025).

73 United States Census Bureau. QuickFacts. *Orange city, California.* Website: https://www.census.gov/quickfacts/fact/table/orangecitycalifornia/POP010210#POP010210 (accessed January 23, 2025).

74 136,416 * 1.275 = 173,930.4

75 State of California Department of Finance (DOF). 2024. E-1 and E-1H Population and Housing Estimates for Cities, Counties, and the State, January 1, 2023 and 2024. Website: https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-1_2024_InternetVersion.xlsx (accessed January 23, 2025).

76 City of Orange General Plan. Growth Management Element. 2010. Website: https://www.cityoforange.org/home/showpublisheddocument/202/637698172544070000 (accessed January 23, 2025).

77 United States Census Bureau. QuickFacts. *Orange city, California.* Website: https://www.census.gov/quickfacts/fact/table/orangecitycalifornia/POP010210#POP010210 (accessed January 23, 2025).

78 136,416 * 1.275 = 173,930.4

79 State of California Department of Finance (DOF). 2024. E-1 and E-1H Population and Housing Estimates for Cities, Counties, and the State, January 1, 2023 and 2024. Website: https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-1_2024_InternetVersion.xlsx (accessed January 23, 2025).

80 County of Orange. 2020. General Plan Growth Management Element. November. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/2020-12/Chapter%20XI%20-Growth%20Management%202020.pdf (accessed January 23, 2025).

81 State of California Department of Finance (DOF). 2024. E-1 and E-1H Population and Housing Estimates for Cities, Counties, and the State, January 1, 2023 and 2024. Website: https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-1_2024_InternetVersion.xlsx (accessed January 23, 2025).

82 Southern California Association of Governments. Final Connect SoCal 2024. Website: https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (accessed May 4, 2025).

would be limited to the project site and would not have the potential to induce unplanned population growth in the vicinity of the project site, especially given that the land immediately surrounding the project site is already developed and served by appropriate utilities and service providers.

Ultimately, any population growth associated with the proposed project would be negligible in comparison to the overall population of the City and the County. Further, the proposed project does not contain any growth-inducing roadway or infrastructure improvements with the potential to result in population growth. Impacts would be less than significant, and no mitigation is required.

Question 4.18 b): Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Response to Question 4.18 b):

No Impact. As previously mentioned, the proposed project includes the construction of three new buildings, including associated landscaping and hardscaping, for the proposed County of Orange Workforce Reentry Center. The project site is currently a vacant disturbed lot. As such, the proposed project would not result in the displacement of any housing or employment centers and would not require the construction of replacement housing elsewhere. No impact would occur, and no mitigation is required.

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4.19 *Public Services*

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:				
a-i) Fire protection.	☐	☐	☒	☐
a-ii) Police protection.	☐	☐	☒	☐
a-iii) Schools.	☐	☐	☐	☒
a-iv) Parks.	☐	☐	☒	☐
a-v) Other public facilities.	☐	☐	☐	☒

Question 4.19 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:

Question 4.19 a-*i*): Fire protection.

Response to Question 4.19 a-*i*):

Less Than Significant Impact. Fire protection and emergency medical services for the proposed project would be provided by the Orange City Fire Department (OCFD). The OCFD consists of eight fire stations with paramedic teams, four of which include ambulance service with an average response time of approximately five minutes.[83] Based on the location of the project site, primary fire and paramedic services would be provided by Station No. 6, located 0.3 mile north of the project site at 345 The City Drive South. OCFD Fire Station No. 5, located approximately 1.5 miles northeast of the project site at 1345 West Maple Avenue, is the second-closest station, and would respond in the event that Station No. 6 could not.

The OCFD is the reviewing fire agency, as delegated by the State Fire Marshal, for the proposed project's design of fire safety and suppression implementation. The proposed project's fire suppression design includes a fire lane proposed throughout the project site perimeter. Emergency vehicle access would be provided at the three proposed driveways and surrounding the proposed buildings and parking lot.

[83] City of Orange General Plan Safety Element. 2010. Website: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000 (accessed January 20, 2025).

Although the proposed project would result in an increase in population on site, the Workforce Reentry Center is intended to support adult individuals involved in the criminal justice system or other County systems of care. Therefore, the OCFD likely already serves the individuals proposed to reside and visit the project site, it would be unlikely that service ratios or response times would be impacted, and no new facilities would be necessary to maintain existing ratios.

The proposed project would not result in any substantial adverse physical impacts associated with the provision of or need for physically altered fire protection facilities and would require no additional expansion or staffing to maintain acceptable service ratios and response times. Therefore, impacts would be less than significant, and no mitigation is required.

Question 4.19 a-*ii*): Police protection.

Response to Question 4.19 a-*ii*):

Less Than Significant Impact. The Orange Police Department (OPD) provides police protection services within the City and would therefore serve the project site. The OPD headquarters is located at 1107 North Batavia Street, approximately 2.5 miles northeast of the project site. The OPD has three divisions, including field services, support services, and investigative services. Additionally, the OPD headquarters includes the Orange Emergency Operation Center. According to the Orange Police Department 2024 Annual Report, the patrol unit received 95,570 calls for service, in which the average response time was four minutes.[84] Although the proposed Workforce Reentry Center project would incrementally increase the need for police services in the area, the project site is located in an area that is within the existing service area of OPD. Further, the scale of the project would be minimal in the context of the OPD's existing service area.

It should be noted that the northern and northeastern boundaries of the project site are adjacent to the Theo Lacy Facility, a maximum-security adult jail complex operated by the OC Sheriff. Given the secure nature of the Theo Lacy Facility, law enforcement personnel, such as guards, are present 24/7 on site. A portion of the project site contains a recreational field that is behind the Theo Lacy Facility security perimeter but is not currently utilized. Under the proposed project, this security fencing would be removed and replaced by a security block wall to accommodate the project site boundary. The replacement of the existing security fence with a block wall would be subject to OC Sheriff approval in order to ensure that construction and operation could be undertaken in a secure manner. As a result, the proposed project would not result in any security risks at the Theo Lacy Facility and would not affect OC Sheriff staffing levels at this facility.

Based on the analysis presented above, the proposed project would not require new or physically altered police protection facilities, the construction of which could cause significant environmental effects. Therefore, impacts would be less than significant, and no mitigation is required.

Question 4.19 a-*iii*): Schools.

Response to Question 4.19 a-*iii*):

[84] City of Orange Police. 2024. *2024 Police Annual Report*. Website: https://www.cityoforange.org/home/showdocument?id=4318&t=638163205533964554 (accessed May 14, 2025).

No Impact. The proposed project includes the construction of a Workforce Reentry Center for adult individuals involved in the criminal justice system or other County systems of care. A vocational building is proposed under the project to provide program participants with vocational classes and educational training. The proposed project would generate residential uses for program participants who opt to live on site within the proposed supportive housing. Because the Workforce Reentry Center is intended for adult participants, no school-aged children are intended to reside on the project site. Therefore, the proposed project would not require expansion or additional staffing of off-site schools or other public facilities because the proposed project is intended to provide vocational training to adult individuals. Therefore, the proposed project would have no impact on existing public or private schools. No impact would occur, and no mitigation is required.

Question 4.19 a-*iv*): Parks.

Response to Question 4.19 a-*iv*):

Less Than Significant Impact. The proposed project includes outdoor amenities such as a garden area, grass turf, and lounge areas for passive recreation. Project participants would have access to passive recreation amenities provided onsite and local city parks. Nearby parks include parks in the neighboring cities of Santa Ana and Garden Grove. Neighborhood Park is the nearest park to the project site, located approximately 0.4-mile southwest of the project site at 740 South Vine Street. Although the proposed project would increase the number of individuals on the project site, the program participants are individuals that are likely to already reside elsewhere in the County, and therefore already use existing park facilities within the County. Therefore, the potential increased use of existing parks or recreational facilities in the area would be negligible, and the proposed project would not result in substantial adverse physical impacts that would result in the need for new or physically altered park facilities. Impacts would be less than significant, and no mitigation is required.

Question 4.19 a-*v*): Other public facilities.

Response to Question 4.19 a-*v*):

No Impact. The proposed project may result in a negligible increased demand for fire protection, police, and parks as the proposed project would introduce new land uses within the project site. The proposed Workforce Reentry Center is intended to provide program participants with a safe space to live and work on-site. Some program participants may commute to the Workforce Reentry Center for vocational training courses and report to work at an off-site location. Program participants are expected to be adult individuals involved in the criminal justice system or other County systems of care, such as the County of Orange Collaborative Courts division. Therefore, it is likely that most of the program participants and staff already reside elsewhere in the County and are supported by other existing public facilities. No additional demand on off-site public facilities in the project vicinity is required. Therefore, no impact would occur, and no mitigation is required.

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4.20 *Recreation*

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

Question 4.20 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?

Response to Question 4.20 a):

Less than Significant Impact. The proposed project involves the construction and operation of the Workforce Reentry Center, which would offer workforce reentry support for adult individuals involved in the criminal justice system or other County systems of care. Proposed recreational components include a garden area, grass turf, and lounge areas for passive recreation. Some program participants would to live on site in supportive housing units and may use the proposed outdoor areas for recreational use. Other program participants may only attend vocational classes or work on-site daily, allowing them to commute throughout the City or the greater region. Although the proposed project would increase the number of individuals on the project site from its existing undeveloped condition, the program participants are individuals that are likely to already reside in the County. Therefore, the potential increased use of existing parks or recreational facilities in the area would be negligible. No substantial physical deterioration of the neighborhood or the regional parks would occur or be accelerated. Impacts are less than significant, and no mitigation is required.

Question 4.20 b): Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Response to Question 4.20 b):

Less than Significant Impact. As previously stated, a portion of the project site is currently developed with a former recreational field associated with the adjacent Theo Lacy Facility. However, the Theo Lacy Facility has ceased use of this field and limits outdoor recreational activities to an adjacent field, separated from the abandoned field by a chain-link fence. Therefore, the development of this field under the proposed

project would not affect the recreational needs of Theo Lacy Jail inmates. Construction of the proposed project would require the installation of a security wall between the recreational field to be developed under the proposed project and the adjacent recreational field to remain in use by the Theo Lacy Facility. During construction, inmate outdoor recreational activities would be temporarily relocated in order to maintain security of the premises. However, this relocation would be temporary in nature and would return to pre-project conditions following construction of the security wall.

The proposed project includes the development of outdoor areas for passive recreation for program participants, staff, and visitors. The outdoor areas would include picnic areas, chairs and tables, garden area, grass turf, pet relief areas, and benches. These outdoor recreational improvements would be designed to blend with the proposed landscaping. Paved sidewalks would be implemented to provide clear pathways for program participants, staff, and visitors. These recreational amenities would assist in the goal of the Workforce Reentry Facility to provide program participants with a safe and supportive environment. Therefore, the proposed recreational amenities would result in a less than significant impact on the environment, and no mitigation is required.

4.21 *Transportation*

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The analysis presented in this section is based upon information presented in the *Traffic Impact Analysis Workforce Re-Entry* Center, Orange, California (TIA) and the *Vehicle Miles Traveled (VMT) Screening Assessment for the Proposed Workforce Reentry Traffic Support, County of Orange, CA* (VMT Screening Memorandum) prepared for the proposed project by Linscott, Law & Greenspan, Engineers (LLG), in April 2025. These reports, collectively, are included as Appendix J to this IS/MND.

Question 4.21 a): Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Response to Question 4.21 a):

Less than Significant Impact. The proposed project involves the development of three buildings, as well as associated landscaping, hardscaping, and infrastructure improvements, to provide a facility to house adult individuals involved in the criminal justice system or other County systems of care and assist with their transition into the workforce. The project site is currently a vacant disturbed lot. As such, under existing conditions, the project site does not generate any vehicle trips.

The proposed project would result in consistent human presence on the project site, including residents/program participants, staff, and temporary visitors. The proposed project would house up to 54 people on-site, of which approximately 40 percent could have jobs off-site. In addition, it is assumed that roughly half of the individuals housed on-site would likely not have a car and would use other means of transportation, including walking, bicycling, and using transit. As such, it has been conservatively assumed

that approximately 11 people would leave the project site to attend work between 7:00 a.m. and 8:00 a.m. and arrive back between 5:00 p.m. and 6:00 p.m. during the commuter peak hour.

The educational aspects of the proposed project would include retail/culinary uses that would produce items that could be sold to the general public for profit. The project would include 7,675 sf of retail type uses, which could consist of merchandise/apparel, artwork, bistro/coffee, salon, tattoo removal, pet grooming, or fitness uses. The teaching/training component of the proposed project would include up to 60 staff members with varying schedules between 8:00 a.m. and 5:00 p.m., with 20 percent starting at 6:00 a.m. and 20 percent starting at 3:00 p.m., both of which are outside of the commuter peak hour. It has been conservatively assumed that the remaining 60 percent of the staff would arrive between 7:00 a.m. and 8:00 a.m. and depart between 5:00 p.m. and 6:00 p.m. during the commuter peak hour. It is anticipated that up to 20 students that do not live on-site would participate in the training/sales component of the proposed project. Conservatively, it is assumed that all 20 students would arrive between 7:00 a.m. and 8:00 a.m. and depart between 5:00 p.m. and 6:00 p.m. during the commuter peak hour. For more details regarding the assumptions made regarding vehicular trips to and from the project site, refer to the TIA, included in Appendix J.

Four key intersections in the vicinity of the project site were selected for evaluation under the proposed project, as follows:

- The City Drive at Outlet Drive
- The City Drive at Metropolitan Drive
- The City Drive at SR-22 Eastbound (EB) Ramps
- SR-22 Westbound (WB) Ramps at Metropolitan Drive

The Level of Service (LOS) at these key locations with and without the proposed project was used to evaluate the potential circulation effects associated with implementation of the proposed project. LOS is a qualitative assessment of the quantitative effects of such factors as traffic volume, roadway geometrics, speed, delay, and maneuverability on roadway and intersection operations. As shown in Table 4.21.A below, LOS can range from A, representing free-flow activity, to F, representing overcapacity operation.

Table 4.21.A: Level of Service Methodology

Level of Service	Description
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized, and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally, drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is attained no matter how great the demand.
F	This level describes forced-flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream.

Source: Traffic Impact Analysis, Workforce Re-Entry Center, Orange, California (LLG 2025).

As discussed in the TIA, existing intersection conditions were measured using the Intersection Capacity Utilization (ICU) methodology for signalized intersections and the methodology outlined in the Highway Capacity Manual (HCM) for unsignalized intersections. The ICU method estimates the volume to capacity (V/C) relationship for an intersection based on the individual V/C ratios for key conflicting traffic movements. An intersection's ICU value then translates to a LOS estimate, as shown in Table 4.21.B below.

Table 4.21.B: Volume/Capacity Ratio Methodology

Level of Service	Volume-to-Capacity (ICU Methodology)
A	≤0.60
B	>0.60 and ≤0.70
C	>0.70 and ≤0.80
D	>0.80 and ≤0.90
E	>0.90 and ≤1.00
F	>1.00

Source: Traffic Impact Analysis, Workforce Re-Entry Center, Orange, California (LLG 2025).
ICU = intersection capacity utilization

The HCM method measures the LOS of unsignalized intersections using computed or measured control delay (in seconds per vehicle). The relationship between LOS and the delay at unsignalized intersections is shown in Table 4.21.C, below.

Table 4.21.C: Highway Capacity Manual Methodology

Level of Service	Signalized Intersection Delay (seconds) per Vehicle	Unsignalized Intersection Delay (seconds) per Vehicle	Level of Service Summary
A	≤10.0	≤10.0	Little or no delay
B	>10.0 and ≤20.0	>10.0 and ≤15.0	Short traffic delays
C	>20.0 and ≤35.0	>15.0 and ≤25.0	Average traffic delays
D	>35.0 and ≤55.0	>25.0 and ≤35.0	Long traffic delays
E	>55.0 and ≤80.0	>35.0 and ≤50.0	Very long traffic delays
F	>80.0	>50.0	Severe congestion

Source: Traffic Impact Analysis, Workforce Re-Entry Center, Orange, California (LLG 2025).

According to City standards, LOS D is the minimum acceptable condition for roadway segments during peak commute hours. As shown in Table 4.21.D below, under existing conditions, all four key study intersections operate at an acceptable level of service during both the AM and PM peak hour.

Table 4.21.D: Existing Peak Hour Intersection Capacity Analysis

Key Intersection	Jurisdiction	Time Period	Minimum Acceptable LOS	Control Type	ICU	LOS
The City Drive at Outlet Drive	Orange	AM PM	D	3 Phase Traffic Signal	0.209 0.241	A A
The City Drive at Metropolitan Drive	Orange	AM PM	D	3 Phase Traffic Signal	0.355 0.364	A A
The City Drive at SR-22 EB Ramps	Caltrans/Orange	AM PM	D	6 Phase Traffic Signal	0.493 0.597	A A
SR-22 WB Ramps at Metropolitan Drive	Caltrans/Orange	AM PM	D	4 Phase Traffic Signal	0.339 0.377	A A

Source: Traffic Impact Analysis, Workforce Re-Entry Center, Orange, California (LLG 2025).
ICU = Intersection Capacity Utilization
LOS = Level of Service

Roadway Facilities. Traffic generation potential of the proposed project was calculated using information found in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. This calculation includes vehicular trips associated with the proposed on-site retail uses, as well as program staff, on-site housing, and outside students. Further, an internal trip capture of 15 percent on a daily basis, and 5 percent and 15 percent during the AM peak hour and PM peak hour, respectively, was applied to the commercial uses to account for the interaction with students and staff of the other on-site uses. As shown in Table 4.21.E below, the proposed project is forecast to generate 491 daily trips, with 81 trips (64 inbound, 17 outbound) produced in the AM peak hour and 92 trips (24 inbound, 68 outbound) produced in the PM peak hour on a “typical” weekday.

Table 4.21.E: Project Trip Generation Rates and Forecast

ITE Land Use Code/Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Generation Rates:							
822: Strip Retail Plaza <40k (TE/TSF)	54.45	60%	40%	2.36	50%	50%	6.59
Proposed Project Generation Forecast:							
Retail (7,810 SF)	425	11	7	18	26	25	51
Employee Reduction (10 Employees)[1]	-20	-1	0	-1	-1	-1	-2
Subtotal	*405*	*10*	*7*	*17*	*25*	*24*	*49*
Internal Capture (10% Daily, 5% AM, 15% PM)	-41	-1	0	-1	-4	-3	-7
Subtotal	*364*	*9*	*7*	*16*	*21*	*21*	*24*
Pass-by (15% Daily, 15% AM, 40% PM)[2]	-55	-1	-1	-2	-8	-9	-17
Retail Subtotal	*309*	*8*	*6*	*14*	*13*	*12*	*25*
Staffing (60 Staff)[3]	120	36	0	36	0	36	36
On-Site Housing (54 beds)[4]	22	0	11	11	11	11	11
Outside Students (20 students)[5]	40	20	0	20	0	20	20
Total Trip Generation Forecast	**491**	**64**	**17**	**81**	**24**	**68**	**92**

Source: Traffic Impact Analysis, Workforce Re-Entry Center, Orange, California (LLG 2025).

[1] A trip reduction was applied to the commercial component since the employees of the commercial uses will be comprised of students and staff that will already be on-site.

[2] Pass-By trips are trips made as intermediate stops on the way from an origin to a primary trip destination. Pass-by trips are attracted from traffic passing the site on adjacent streets, which contain direct access to the generator.

[3] Conservatively it has been assumed that 60% of the staff would arrive between 7:00 AM – 8:00 AM and depart between 5:00 PM – 6:00 PM during the commuter peak hour. The remaining 40% of the staff would arrive outside of the peak hours.

[4] Approximately 40% of the people housed on-site could have jobs off-site and about half of the people housed on-site would likely not have a car and would use other means for transportation (i.e. walk, bike, bus, etc.). Therefore, it has conservatively been assumed that approximately 11 people would leave the site to attend work from 7:00 AM – 8:00 AM and arrive back between 5:00 PM – 6:00 PM during the commuter peak hour.

[5] Conservatively, it has been assumed that all 20 students would arrive between 7:00 AM – 8:00 AM and depart between 5:00 PM – 6:00 PM during the commuter peak hour.

TE/TSF = Trip End per Thousand Square Feet

The TIA modeled future traffic conditions with and without the proposed project using an ambient growth factor, which includes unknown and known future projects within the project site vicinity to represent cumulative conditions. Altogether, all 15 cumulative projects evaluated in the TIA are forecast to generate a total of 38,013 daily trips, with 2,226 trips forecast during the AM peak hour and 2,924 trips forecast during the PM peak hour.

Peak hour level of service conditions were calculated for the four key study intersections with and without the addition of project traffic for the years 2028 (Opening Year) and 2050 (Buildout Year). According to ICU and HCM analysis presented in the TIA, the four key study intersections are forecast to continue operating at an acceptable LOS under both the AM and PM peak hours under Opening Year cumulative traffic conditions, both with and without project traffic. Similarly, in the Buildout Year cumulative traffic condition, the four key study intersections are forecast to continue operating at an acceptable LOS under both the AM and PM peak hours.

As stated in Section 3.0, Project Description, of this IS/MND, the proposed project includes several off-site improvements that would allow for operation of an 8-phase traffic signal to improve vehicular access to the project site. Other modifications would include the addition of a southbound left-turn lane along The City Drive at its intersection with Metropolitan Drive and median modifications to allow for a dual left-turn lane, single through lane and a dual right-turn lane. With these improvements, the TIA found that all project driveways would operate at an acceptable LOS under both the Opening Year and Horizon Year

scenarios. Therefore, the proposed project would not result in an inconsistency with applicable plans and policies related to roadway performance.

Transit Facilities. Under existing conditions, the project site is highly accessible via transit due to its proximity to several Orange County Transportation Authority (OCTA) bus stops. The closest bus stop to the project site is located along the northern curb of West Metropolitan Drive, just west of the intersection of West Metropolitan Drive with The City Drive South, approximately 250 feet from the project site. The project site is served by OCTA Routes 47 and 57. Route 47 operates on approximate 20-minute headways during weekdays and 30-minute headways during weekends, while Route 57 operates on approximate 15-minute headways on weekdays and 20-minute headways on weekends.

Route 47 includes a stop at the Fullerton Transportation Center, which provides both Metrolink and Amtrak service. Route 57 includes a stop at the Anaheim Regional Transportation Intermodal Center (ARTIC) Station, which provides both Metrolink and Amtrak services, as well as long-distance bus services through Greyhound and FlixBus. As such, the project site has access to both local and regional connectivity options via public transit. While the project does propose improvements to The City Drive South and West Metropolitan Drive, these improvements would not affect the existing bus stop along West Metropolitan Drive or any other nearby bus stops. As such, the proposed project would not interfere with any applicable plans pertaining to transit facilities within the circulation system.

Bicycle Facilities. According to the Orange County Bikeways Map Guide,[85] no bicycle lanes currently exist along the cross-streets providing access to the proposed project. The project site is located in close proximity to the Santa Ana River Trail, which is classified as a Class I bicycle path along the Santa Ana River.

It should be noted that the Santa Ana River Trail Bikeway, though located near the project site, is not directly accessible from the project site due to the presence of a large cinderblock perimeter wall. The proposed project does not include any changes to this perimeter wall, and access to the Santa Ana River Trail Bikeway would remain unchanged.

The proposed project would provide bicycle parking to accommodate individuals choosing to utilize this alternative mode of transportation, consistent with Section 5.106.4. of the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), as amended. Specifically, the proposed project design would include 12 short-term bicycle parking stalls and nine long-term bicycle storage lockers for use by visitors, employees, or program participants. Because the proposed project would not interfere with any existing bicycle facilities and would provide bicycle parking on site, the proposed project would not interfere with any applicable plans pertaining to bicycle facilities within the circulation system.

Pedestrian Facilities. The proposed on-site improvements under the proposed project would include new internal circulation sidewalks surrounding and between the proposed buildings. These sidewalks would be designed in an ADA-compliant manner and would be surrounded by landscaping where feasible to improve the pedestrian experience. The proposed off-site improvements under the proposed project would not remove or otherwise impair pedestrian movement.

The proposed signalization of the main project driveway, located at the intersection of The City Drive South and West Metropolitan Drive, would include a pedestrian walk sign to ensure safe pedestrian crossings from between the north and south ends of the driveway. Further, existing pedestrian crossings

[85] Orange County Transportation Authority (OCTA). Orange County Bikeways Map Guide. Website: https://www.octa.net/pdf/ocbikewaysmap.pdf (accessed January 22, 2025).

at the southern and western edges of the intersection would be maintained under the proposed project. All sidewalks and driveways adjacent to the proposed project would comply with applicable ADA curb cut and driveway regulations. Further, the proposed project would not impede access to any existing public pedestrian facilities along The City Drive South or West Metropolitan Drive. As such, the proposed project would not interfere with any applicable plans pertaining to pedestrian facilities within the circulation system.

Based on the analysis presented above, the proposed project would not conflict with any City or County program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

Question 4.21 b): Would the project conflict or be inconsistent with CEQA section 15064.3, subdivision (b)?

Response to Question 4.21 b):

Less than Significant Impact. On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, which directed the Governor's Office of Planning and Research (OPR) to establish new CEQA guidance for jurisdictions that removes the level of service (LOS) method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis. Rather, vehicle miles traveled (VMT), or other measures that promote "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses," are now used as the basis for determining significant transportation impacts in the State.

As part of a January 2018 update to the *State CEQA Guidelines*, Section 15064.3 codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(4) stipulates that lead agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT.

The City adopted the *City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City VMT Guidelines) in July 2020, pursuant to SB 743, to include VMT analysis methodology and thresholds. In addition, the County Board of Supervisors adopted the *Guidelines for Evaluating Vehicle Miles Traveled under CEQA* (County VMT Guidelines),[86] at its November 17, 2020, meeting. Given that the roadways surrounding the project site are generally under the City's jurisdiction, the TIA analyzes the proposed project within the context of the City VMT Guidelines, rather than the County VMT Guidelines.

The City VMT Guidelines state that there are multiple types of screening that can be applied to screen projects from project-level assessment. If a project meets these screening criteria, it can be considered to have a less than significant impact on transportation and circulation and no further VMT analysis is required. A project can be screened out from a detailed VMT analysis under the City VMT Guidelines if

[86] County of Orange. 2020. Guidelines for Evaluating Vehicle Miles Traveled Under CEQA, September. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/2022-12/Oak%20Grove_App%20H%20OC%20VMT%20Guidelines.pdf (accessed May 15, 2025).

the project site is within a Transit Priority Area (TPA), unless the project is inconsistent with the RTP/SCS, has a floor-to-area ratio (FAR) less than 0.75, provides an excessive amount of parking, or reduces the number of affordable residential units. According to the TIA, the project site is located within a SCAG-designated TPA. However, based on calculations presented in the VMT Screening Memorandum, the proposed project's FAR would be less than 0.75, making the proposed project ineligible for screening under this criterion. The City also has also established a Low VMT Screening criterion, under which residential and office projects located in a low VMT-generating area can be screened out. The TIA notes that, because the project site is in an area that has a higher VMT than the City's average, the proposed project will not screen out under this criterion.

Although the proposed project does not meet the screening criteria discussed above, it does meet another screening criterion under the City VMT Guidelines, known as the Project Type Screening. Under this criterion, a project can be screened out from a detailed VMT analysis if it is a certain project type that the City has determined to be local serving in nature. Such uses include local-serving retail uses less than 50,000 square feet, as well as affordable, supportive, or transitional housing. As previously stated throughout this IS/MND, the proposed project contains a public-facing retail component under which program participants can gain customer service skills. These retail uses would operate out of the proposed 16,166 sf retail/culinary building. As such, the retail portion of the proposed project would screen out under the Project Type Screening. Further, the supportive housing beds provided under the proposed project would qualify as affordable housing units. Therefore, the proposed project would screen out under the Project Type Screening.

Based on the proposed project's consistency with the Project Type screening criterion contained in the City VMT Guidelines as detailed above, the VMT Screening Memorandum determined that the proposed project is exempt from further VMT analysis and is presumed to have a less than significant impact under CEQA related to VMT. As such, the proposed project would not result in any inconsistencies with *State CEQA Guidelines* Section 15064.3, subdivision (b), and no mitigation is required.

Question 4.21 c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Response to Question 4.21 c):

Less than Significant with Mitigation Incorporated. With implementation of the proposed project, vehicle access to the property would continue to be provided via The City Drive South, which runs in a north-south orientation and is classified as a Principal Arterial roadway in the City's General Plan Circulation and Mobility Element.[87] Specifically, the project site would be accessible via three driveways along The City Drive South. The driveway at the intersection of The City Drive South and West Metropolitan Drive would be integrated into the existing intersection traffic signal. Secondary access is proposed via right-turn only driveways located at both the northern and the southern portions of the site.

The proposed project would include an internal circulation roadway connecting each driveway with proposed surface parking and each proposed building. Specifically, from the northernmost driveway, the internal circulation roadway would run south of the vocational/office building, loop around the eastern edge of the residential building, and then run to the south of the residential and retail/culinary buildings.

[87] City of Orange. 2015e. City of Orange General Plan Circulation and Mobility Element. December. Website: https://www.cityoforange.org/home/showpublisheddocument/192/637698172525970000 (accessed January 14, 2025).

This roadway would be designed in a manner compliant with minimum turn radii and would not include any sharp curves or turns that would result in hazardous conditions. The TIA prepared for the proposed project included a Sight Distance Evaluation, which found that the sight lines at the proposed project's driveways are expected to be adequate as long as obstructions are minimized within areas designated as Limited Use Areas in the TIA, as included in Mitigation Measure (MM) TRA-1.

Further, the signalization of the project's driveway at the intersection of The City Drive South and West Metropolitan Drive and the corresponding lane restriping and median modifications to both roadways would ensure that the intersection can safely accommodate vehicles entering and exiting the project site. The left turn from West Metropolitan Drive onto The City Drive South and the left turn from the project site onto The City Drive South would operate as a lead-lag sequence, in which protected left turns can be leading or lagging the through traffic to ensure a smoother turn sequence at this intersection. In addition, a sign prohibiting northbound vehicles along The City Drive South from making right turns into the main project driveway during the red light would be installed at the intersection of The City Drive South and West Metropolitan Drive to eliminate any potentially dangerous intersection conditions. Lastly, the project site's internal circulation roadway would include two stop signs for outbound vehicles turning west into the project driveway turn lanes to avoid collisions with inbound traffic traveling east into the project site.

The TIA included a queuing analysis to determine the required stacking/storage lengths for all turning lanes providing access to each of the three proposed driveways. This analysis determined that existing and proposed turn lane storage is adequate to accommodate anticipated queuing, except for the westbound through/right-turn movement exiting the project site via the main project driveway at the intersection of The City Drive and Metropolitan Drive. However, the TIA notes that this issue could be addressed by restriping the outbound lanes to include an additional outbound through lane where a painted median is currently proposed, which would result in an improved queue that can be accommodated on site. The County's adherence to this recommendation is mandated by MM TRA-1. Therefore, the proposed project would not substantially contribute to vehicle queuing that could exceed the capacity of turn lanes and create hazards to through traffic at intersections in the vicinity of the project site.

The proposed project would not introduce any new roadways, except for the proposed internal circulation roadway, which would be designed in compliance with all applicable width and turn radius requirements. The proposed project would be consistent with surrounding land uses and available infrastructure and would not introduce any incompatible uses into the project site or the project vicinity. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant with incorporation of MM TRA-1.

Mitigation Measure:

MM TRA-1 **Compliance with Traffic Impact Assessment Recommendations.** Prior to the issuance of a certificate of occupancy, the Director of the Orange County Public Works Department shall ensure that the project conforms to the sight distance recommendations included in the Traffic Impact Assessment (TIA), which was prepared by Linscott, Law & Greenspan, Engineers (LLG), titled *Traffic Impact Analysis Workforce Re-Entry Center, Orange, California, April 14, 2025.* Specifically, the County shall adhere to the following recommendations:

- Restripe the proposed outbound lanes to include an additional through lane; and

- Adhere to the following restrictions within the Limited Use Areas identified in Figures 9-4 through 9-6 of the TIA:
  - Hardscape and/or landscape shall not exceed a height of 30 inches;
  - Fences or walls of any kind shall not be permitted;
  - Maximum tree trunk size shall be 24 inches in diameter (maximum size at maturity); and
  - Minimum tree spacing shall be 60 feet on center.

Question 4.21 d): Result in inadequate emergency access?

Response to Question 4.21 d):

Less than Significant Impact. Emergency vehicle access to the project site would be provided via the three driveways previously described, and the proposed internal circulation roadway has been designed to accommodate the weight, length, and width of a fire apparatus consistent with the City's Fire Truck Turning Radius Template, which would be verified with the OCFD.

The proposed project is not expected to result in substantial traffic impacts or queuing on nearby streets during construction, as all equipment would be staged within the project site. Additionally, there are no major changes proposed to the existing circulation system surrounding the site during project operations, ensuring that emergency evacuation routes remain unaffected. Access to The City Drive South will remain unobstructed during both construction and operation. As discussed in Response to Question 4.21 a) above, the proposed project would contribute minimal peak-hour trips to surrounding roadways, which would not result in substantial delays to the movement of emergency vehicles along these roadways. As previously stated, with the intersection improvements proposed under the project, all four key intersections and all three project driveways are forecast to operate at an acceptable LOS in both the Opening Year and the Buildout Year scenarios.

The proposed project would comply with Chapter 5 of the California Fire Code (CFC) requirements pertaining to emergency apparatus roadways and water supply. Further, the proposed project would be reviewed and approved by the OCFD and County staff as part of the City's Design Review process to ensure the proposed project is compliant with all applicable codes and ordinances for emergency vehicle access. Therefore, with OCFD's review of the project plans, project impacts related to emergency access would be less than significant, and no mitigation is required.

4.22 *Tribal Cultural Resources*

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Question 4.22 a): Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

Question 4.22 b): A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Response to Questions 4.22 a) and b):

Less than Significant with Mitigation Incorporated. Effective July 1, 2015, Assembly Bill (AB) 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Public Resources Code (PRC) Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are

eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resource. Per PRC Section 21080.3.1, a tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

The Native American Heritage Commission (NAHC) is a State agency that maintains the Sacred Lands File (SLF), an official list of sites that are of cultural and religious importance to California Native American tribes.

In compliance with AB 52, letters have been distributed to local Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and have previously requested to be notified of future projects proposed by the County. The letters, which were sent on February 20, 2025, via certified mail, provided each tribe with an opportunity to request consultation with the County regarding the proposed project. The purpose of this effort was to provide Native American tribes with the opportunity for meaningful participation and to identify known tribal cultural resources on or near the project site. The record of tribal consultation efforts is included as Appendix K to this IS/MND. The following tribes received letters pursuant to AB 52:

1. Gabrieleño Band of Mission Indians – Kizh Nation
2. Juaneño Band of Mission Indians
3. Gabrieleño Tongva San Gabriel Band of Mission Indians
4. Soboba Band of Luiseño Indians

In compliance with AB 52, tribes had 30 days from the date of receipt of notification to request consultation on the proposed project. Information provided through the AB 52 tribal consultation process typically informs the assessment as to whether tribal cultural resources are present within the project site and the significance of any potential impacts to such resources. A response was received during the open tribal consultation period from a representative of the Gabrieleño Band of Mission Indians – Kizh Nation on March 4, 2025. The Kizh Nation representative requested to initiate the formal consultation process with the County, which is currently still ongoing. However, the County has established a standard measure based on previous consultation proceedings to address potential tribal concerns regarding the proposed project. As such, Standard Condition (SC) TCR-1 is applicable to the proposed project, as discussed below.

As discussed in Section 4.9, Cultural Resources, of this IS/MND, no known cultural resources have been documented within the project site boundaries or in the direct vicinity of the project site based on archival research and field surveys. In addition, limited potential exists for the proposed project to impact tribal cultural resources due to significant prior disturbance from past grading and development activities on the project site and in the surrounding area. Regulatory Compliance Measure (RCM) CUL-1, identified in Section 4.9, Cultural Resources, sets forth procedures for handling inadvertent discoveries of human remains, including those determined to be Native American.

In addition, the proposed project would incorporate MM CUL-1, also identified in Section 4.9, Cultural Resources. MM CUL-1 sets forth procedures for handling inadvertent archaeological discoveries, which includes tribal cultural resources. Pursuant to MM CUL-1, any tribal cultural resources encountered during construction of the proposed project would be evaluated in accordance with federal, State, and local guidelines to assess their significance and identify avoidance or other measures as appropriate.

To date, no other responses from the Native American community have been received as part of the AB 52 tribal consultation effort. As a result of the County's consultation efforts, no known tribal cultural resources have been identified within the project site. As such, incorporation of MM CUL-1 and adherence to SC TCR-1 and RCM CUL-1 would ensure that impacts related to the inadvertent discovery of Native American resources would be less than significant.

Standard Condition:

SC TCR-1 **Unanticipated Discovery of Native American Resources.** If unanticipated archaeological resources or deposits are discovered during ground-disturbing activities, Orange County Public Works (OC Public Works) shall implement the following measures. All work shall halt within a 50-foot radius of the discovery. OC Public Works shall retain a qualified professional archaeologist with knowledge of Native American resources to assess the significance of the find. If the resources are Native American in origin, OC Public Works shall coordinate with the Tribe regarding evaluation, treatment, curation, and preservation of these resources. The archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment in consultation with OC Public Works. Work shall not continue within the no work radius until the archaeologist conducts sufficient research and evidence and data collection to establish that the resource is either: (1) not cultural in origin; or (2) not potentially eligible for listing on the California Register of Historical Resources. If a potentially eligible resource is encountered, then the archaeologist and OC Public Works, as lead agency, in consultation with the Tribe, shall arrange for either: (1) avoidance of the resource, if possible; or (2) test excavations to evaluate eligibility, and if eligible, attempt to resolve adverse effects through implementation of appropriate mitigation, which may include, but shall not be limited to, salvage excavation, laboratory analysis and processing, research, curation, and preparation of a report summarizing the find. The assessment of eligibility shall be formally documented in writing as verification that the provisions in the California Environmental Quality Act for managing unanticipated discoveries and Public Resources Code Section 5024 have been met.

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4.23 *Utilities and Service Systems*

Would the project:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Question 4.23 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?

Response to Question 4.23 a):

Less than Significant Impact.

Water. As previously described, the project site was previously developed with various structures that were served by various wet and dry utilities. Demolition of these structures to grade occurred in April and May 2025. However, this demolition removed above-grade structures only, and did not involve ground disturbance activities, which would occur under the proposed project. The project site is currently a vacant disturbed lot; however, underground utility infrastructure associated with former development remains underlying the project site.

Water demand within the project site, and much of northern and central portions of the County, is supplied by the OCWD. The OCWD water supply originates from the Coastal Plain of Orange County Groundwater Basin, which is managed and refilled by OCWD.[88]

The City's Water Division provides domestic water service in the City and constructs and maintains the City's water supply system.[89] The City's primary source of water supply is groundwater supplied by the OCWD, as discussed above. In addition, the City's groundwater supply is supplemented by imported water and surface water purchased from the Metropolitan Water District of Southern California (MWDSC) through the Municipal Water District of Orange County (MWDOC). Specifically, according to the City's 2020 Urban Water Management Plan (UWMP), the City's water supply was approximately 77 percent groundwater, 18 percent purchased or imported water, and 5 percent surface water in the Fiscal Year 2019–2020.[90] It is projected that by the year 2045, the water supply mix would be approximately 85 percent groundwater, 11 percent purchased or imported water, and 4 percent surface water.

The proposed project would include additional connections to the existing water main located along The City Drive South to serve the proposed building and landscaping layout. According to the California Emissions Estimator Model (CalEEMod) output for the proposed project, the proposed project is anticipated to generate an indoor water demand of approximately 8,199,345 gallons (approximately 25.2 acre-feet [af]) annually and an outdoor water demand of approximately 311,280 gallons (approximately 1.0 af) annually, for a total combined water demand of 8,510,625 gallons (26.2 af) annually. According to the 2020 UWMP, by 2025, the City's water demand is projected to be approximately 27,233 af annually. In 2045, the total water demand is projected to reach 28,077 af annually, with demand totals increasing between 2025 and 2045. As such, water demand generated by the proposed project would represent a minimal contribution to the overall water demand within the service region. Specifically, water demand generated by the proposed project would amount to approximately 0.10 percent[91] of the City's 2025 demand and 0.09 percent[92] of the City's 2045 demand. As such, it is anticipated that the water demand

88 Orange County Water District (OCWD) How Water Works in Orange County. Website: https://www.ocwd.com/learning-center/how-water-works-in-oc/ (accessed January 20, 2025).

89 City of Orange Water Division. Website: https://www.cityoforange.org/residents/water-division (accessed January 20, 2025).

90 City of Orange. 2020b. Urban Water Management Plan Final. November. Website: https://www.cityoforange.org/home/showpublisheddocument/1540/637873464981170000 (accessed January 20, 2025).

91 (26.2 af / 27,233 af) * 100 = 0.10 percent

92 (26.2 af / 28,077 af) * 100 = 0.09 percent

for the proposed project can be met within the City's existing service capacity, and any potential increase in water demand could be adequately served by existing water supply infrastructure serving the area, except for minor connections to facilities adjacent to the project site.

Further, the proposed project would be required to comply with the principles of the State Model Water Efficient Landscape Ordinance, which require improvements in the efficiency of water use in existing and new urban irrigated landscapes. The County adopted a Water Efficient Landscape Ordinance on March 14, 2016, to enforce the State mandate. The proposed project is subject to this ordinance and would be required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the project site. As discussed in Regulatory Compliance Measure (RCM) UTL-1, preparation of a project-specific Landscape Plan demonstrating compliance with all applicable elements of the Water Efficient Landscape Ordinance would be required. Adherence to RCM UTL-1 would further ensure that project-related water demand would not cause the existing water supply to be exceeded during operations of the proposed project. Impacts related to water facilities would be less than significant, and no mitigation is required.

Regulatory Compliance Measure:

RCM UTL-1 **County of Orange Water Efficient Landscape Ordinance.** Prior to the issuance of any grading or building permit, the Project Applicant shall prepare and submit a Landscape Plan to the Director of the County Public Works Department, or designee. The Director of the Orange County Public Works Department, or designee, shall confirm that the Landscape Plan for the proposed project is consistent with all applicable provisions outlined in the County's Landscape Water Efficiency Ordinance, as codified in Ordinance No. 16-002.

Wastewater Treatment. Under existing conditions, the project site is a vacant disturbed lot and no wastewater is being generated. Wastewater generated under the proposed project would be collected, treated, and disposed of by the Orange County Sanitation District (OCSD). OCSD serves over 20 cities and across 479 square miles, with a service population of approximately 2.6 million people.[93]

Because the project site was developed in the past, the site is already served by wastewater infrastructure in the form of OCSD-owned sewage conveyance facilities. Existing sewer mainlines include a 10-inch mainline along The City Drive South, a 72-inch mainline along the eastern boundary of the project site, and a 30-inch mainline that runs east to west located south of the proposed vocational/office building. The proposed project would require the installation of one or more new 4-inch sewer laterals to be extended as needed from the existing mainline sewer system. These installations would occur concurrently with other construction phases under which ground disturbance would already occur, and therefore would not result in substantial environmental impacts.

Wastewater generated by the proposed project would be conveyed to OCSD facilities, ultimately reaching the OCSD Reclamation Plant No. 1, located approximately 7 miles southwest of the project site at 10844 Ellis Avenue in Fountain Valley. OCSD Reclamation Plant No. 1 has a primary treatment capacity of 208

[93] Orange County Sanitation District (OCSD). n.d. Service Area of Orange County. Website: https://www.ocsan.gov/service-area/ (accessed January 15, 2025).

million gallons per day (mgd) and a secondary treatment capacity of 182 mgd.[94] Between 2023 and 2024, the average daily influent to Reclamation Plant No. 1 was approximately 124 mgd.[95] As such, Reclamation Plant No. 1 is currently operating below capacity, and has the potential to process additional wastewater volume.

According to the CalEEMod output for the proposed project, the proposed project's indoor water demand would amount to approximately 8,199,345 gallons annually, or approximately 22,464 gallons per day (gpd).[96] In the absence of a project-specific wastewater generation estimate, wastewater generation for the project can be assumed to be 90 percent of the project's indoor water demand, to account for evaporation and absorption losses. As such, the proposed project's wastewater generation would be approximately 20,217.6 gpd.[97] This volume represents a negligible contribution to the primary and secondary treatment capacities of Reclamation Plant No. 1, approximately 0.01 percent[98] and 0.01 percent,[99] respectively. Furthermore, all of the proposed project's plumbing fixtures would comply with California Plumbing Code flow rates as well as CALGreen plumbing fixture requirements. Ultimately, the maximum anticipated 20,217.6 gpd of wastewater generated by the proposed project would only represent a small fraction of the primary daily treatment capacity of Reclamation Plant No. 1; therefore, the proposed project could be adequately served by existing wastewater infrastructure, with the exception of new connections to each proposed building. Further, the installation of such connections would occur concurrently with ground disturbance activities during construction of the proposed project, which would minimize potential environmental impacts. As such, the proposed project would not necessitate the construction of new or expanded wastewater facilities that could cause a significant environmental impact. Impacts related to wastewater facilities would be less than significant, and no mitigation is required.

Stormwater Drainage. Refer to Section 4.14, Hydrology and Water Quality, of this IS/MND for further discussion related to the project site's drainage characteristics. Project improvements would include the establishment of a new underground storm drain system, comprised of three parts, which would pretreat runoff in hydrodynamic separators before discharging into a separate infiltration system for each of the project site's six Drainage Management Areas. Stormwater runoff not captured by this new system would drain as surface flow to the existing gutter along The City Drive South, as it does under existing conditions.

Implementation of the proposed project would increase the impervious surface area on the project site, which could potentially increase the volume of stormwater runoff generated within the project site prior to the incorporation of BMPs. However, establishment of the new underground retention/detention system as part of the proposed project would be capable of reducing 2-year, 24-hour storm peak flows to zero. As specified in RCM HYD-4, detailed in Section 4.14, Hydrology and Water Quality, a Final Hydrology Report would be approved by Orange County Public Works and would demonstrate that on-site drainage facilities are designed and adequately sized to convey and reduce runoff such that on-site and off-site drainage capacity would not be exceeded in a design storm. RCM HYD-4 represents adherence to local and state regulations or laws that serve to reduce impacts related to hydrology. With implementation of

94 Orange County Sanitation District (OCSD). 2024. Adopted Budget, Fiscal Years 2024-2025 and 2025-2026. June 26. Website: https://www.ocsan.gov/wp-content/uploads/2024/10/Adopted-Budget-FY-2024-25-and-2025-26.pdf?id=45626& year=all (accessed January 15, 2025).

95 Ibid.

96 8,199,345 gallons per year / 365 days per year = 22,464 gpd

97 22,464 * 0.90 = or approximately 20,217.6 gpd

98 (20,217.6 / 208,000,000) * 100 = 0.01 percent

99 (20,217.6 / 182,000,000) * 100 = 0.01 percent

RCM HYD-4, the proposed project would not exceed the capacity of downstream drainage facilities or cause the expansion of existing facilities, aside from the laterals and underground retention/detention system discussed above. As such, the proposed project would not require or result in the construction of substantial new stormwater drainage facilities or the expansion of existing facilities beyond the improvements included as part of the proposed project. Therefore, impacts to stormwater drainage facilities would be less than significant with the incorporation of RCM HYD-4. No mitigation is required.

Electric Power. Electric power is provided to the project site by Southern California Edison (SCE). SCE services approximately 15 million people across its 50,000-square mile service area.[100] According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was approximately 85,870 gigawatt-hours (GWh).[101] Total electricity consumption in the County in 2022 was approximately 20,244 GWh.[102] Refer to Section 4.10, Energy, of this IS/MND for further discussion related to the project's impacts with respect to existing and projected supplies of electricity. As stated in Section 4.10, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation, which would help reduce the electricity demand of the proposed project.

Although the project site is currently a vacant disturbed lot, there is potential that portions of the project site could still be served by existing electrical infrastructure associated with past development. The proposed project would upgrade and relocate electrical facilities within the site to serve the new facility locations and needs. Specifically, the proposed project includes new pull boxes and conduit conductors, which would follow applicable codes, standards, and criteria. A new electrical enclosure is proposed adjacent to the new cell tower location, as discussed later in this response. The electrical enclosure would include a main switchboard, a battery energy storage system, and conductor conduits.

CalEEMod Version 2022.1.1.29 was used to calculate the approximate annual electricity demand of the proposed project. Based on the CalEEMod outputs, the estimated electricity demand associated with the operation of the proposed project is 994,786 kilowatt-hours (kWh) per year. This would represent approximately 0.005 percent of the total electricity consumption in the County in 2022[103] and approximately 0.001 percent of the total electricity consumption in the SCE service area in 2022.[104] As such, the proposed project's electricity demand would be minimal compared to overall regional and service area consumption.

The proposed project would comply with the California Green Building Standards Code (California Code of Regulations, Title 24). Additionally, the proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, which would substantially reduce electricity usage. Because the proposed project would replace existing development that generates energy demand, would represent a small fraction of electricity demand within the region and service area, and would meet Title 24 requirements, the proposed project would not necessitate the construction of new or expanded

100 Southern California Edison. n.d.-a. About Us. Website: https://www.sce.com/about-us (accessed January 25, 2025).
101 California Electricity Commission (CEC). 2022a. Electricity Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/ elecbyutil.aspx (accessed January 15, 2025).
102 California Electricity Commission (CEC). 2022b. Electricity Consumption by County. Website: http://www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed January 15, 2025).
103 (994,786 / 20,243,721,856) * 100 = 0.005 percent
104 (994,786 / 85,870,000,000) * 100 = 0.001 percent

electric power facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Natural Gas. The natural gas service provider for the project site is the Southern California Gas Company (SoCal Gas). SoCal Gas provides natural gas services to approximately 21.1 million consumers across 24,000 square miles.[105] According to the CEC, total natural gas consumption in the SoCal Gas service area in 2022 was approximately 5,027 million therms (MMBtu).[106] Total natural gas consumption in the County in 2022 was approximately 573 MMBtu.[107] Refer to Section 4.10, Energy, of this IS/MND for further discussion related to the project's impacts with respect to existing and projected supplies of natural gas.

Although the project site is a vacant disturbed lot, there are existing natural gas connections to the project site associated with past development. However, these connections would be rerouted or replaced to serve the reconfigured layout of the project site under the proposed project. As such, the proposed project would upgrade and relocate natural gas facilities within the site to serve the new facility's needs. Natural gas would solely be used for cooking, including culinary training, within the proposed buildings. All heating and cooling equipment within the proposed facilities would be electric and would not utilize natural gas. As such, natural gas usage would be limited under the proposed project.

CalEEMod Version 2022.1.1.29 was used to calculate the approximate annual natural gas demand of the proposed project. Based on the CalEEMod outputs, the estimated potential natural gas demand associated with the operation of the proposed project is 968 thousand BTU per year. This would represent approximately 0.17 percent of the total natural gas consumption in the County in 2022[108] and 0.02 percent of the total natural gas consumption in the SCE service area in 2022.[109] As such, the proposed project's electricity demand would be insignificant in the context of the overall regional and service area and would not necessitate the construction of new large-scale natural gas infrastructure.

Because the proposed project would limit natural gas usage to culinary purposes, the proposed project would not necessitate the construction of substantial new or expanded natural gas facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Telecommunications. Cable, internet, and telephone services are provided to the City's residents by major third-party purveyors. Cellular service available in the City is provided by all major cellular networks, including the project site. The project site is currently served by telecommunications services. It is reasonable to assume that training activities during operation of the proposed project, particularly the office administration, marketing, and IT programs, would rely upon telecommunications services, including cellular and Internet services.

It should be noted that an existing cell tower, approximately 70 feet tall and disguised as a faux tree, is currently located toward the southern project site boundary. The communications company that owns the tower leases an approximately 750 sf concrete block enclosure and an approximately 100 sf area just

[105] Southern California Gas Company (SoCal Gas). n.d.-a. About Us. Website: https://www.socalgas.com/about-us (accessed January 15, 2025).

[106] California Electricity Commission (CEC). 2022c. Gas Consumption by Entity. Website: http://www.ecdms.energy.ca.gov/gasbyutil.aspx (accessed January 15, 2025).

[107] California Electricity Commission (CEC). 2022d. Gas Consumption by County. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed January 15, 2025).

[108] (968,000 / 573,000,000) * 100 = 0.17 percent

[109] (968,000 / 5,027,000,000) * 100 = 0.02 percent

outside the enclosure. Under the existing agreement, the cell tower can be relocated under certain conditions. The cell tower would be demolished prior to construction of the proposed project and relocated to a new location to the west of the current location, yet still along the southern project site boundary. During project construction, the cell tower tenant would likely have a carrier on wheels on site to support the project site during demolition of existing cell tower and construction of the replacement cell tower. This demolition and construction process would occur independently of the proposed project, and the cell tower would not experience any service interruptions during construction of the proposed project. Further, once the proposed project is operational, the communications company would retain full access to the tower for maintenance or other purposes. As such, the increased demand associated with the development of the proposed project would not substantially increase demand for telecommunications services within the relevant telecommunication providers' overall service region. Therefore, the proposed project would not necessitate the construction of new or expanded telecommunications facilities that could cause a significant environmental impact. Impacts would be less than significant, and no mitigation is required.

Summary. As the proposed project would generally replace existing uses on-site, the supply and distribution network of utilities and service systems would generally remain unchanged, except for minor connections to existing infrastructure serving the site. The water, wastewater, stormwater drainage, natural gas, electricity, and telecommunications demands generated by the proposed project would not exceed existing supply or service capacities. Levels of service to users in the surrounding community would not be adversely affected. Effects related to utility improvements and connections proposed as part of the project would be less than significant with adherence to applicable regulations and standards, including landscape irrigation standards required under RCM UTL-1. No project-specific mitigation is required.

Question 4.23 b): Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Response to Question 4.23 b):

Less than Significant Impact. Water is supplied to the project site by the City's Water Division via groundwater supplies from OCWD or imported or surface water via MWDOC.

According to the City's 2020 UWMP, the City's projected water supply is able to meet projected water demands for the years 2025 through 2045 during normal years, single dry years, and multiple dry years. In 2020, the City's actual water supply was 26,993 af.[110] At the time of the preparation of the 2020 UWMP, the projected 2025 water supply is approximately 27,233 af. By 2045, total water supply is projected to reach approximately 28,077 af, marking an increase in supply between 2025 and 2045. Although projected water supplies increase incrementally, projected water demand also increases incrementally. In 2020, the actual water demand was 26,993 af. Total water demand in 2025 is projected to be approximately 27,233 af annually. In 2045, total water demand is projected to reach approximately 28,077 af annually, with demand totals increasing between 2025 and 2045.[111]

[110] City of Orange. 2021. *2020 Urban Water Management Plan Final,* November 2021. Website: https://www.cityoforange.org/home/showpublisheddocument/1540/637873464981170000 (accessed January 15, 2025).

[111] City of Orange. 2021. *2020 Urban Water Management Plan Final,* November 2021. Website: https://www.cityoforange.org/home/showpublisheddocument/1540/637873464981170000 (accessed January 15, 2025).

As discussed in the Response to Question 4.23 b), the proposed project would generate a water demand of approximately 8,199,345 gallons annually, or approximately 0.10 percent of the total water demand estimate for 2025 contained in the 2020 UWMP. This demand would be considered negligible compared to overall water supply and demand within the region and the City. Furthermore, the proposed project's design would incorporate low-flow water fixtures wherever possible in compliance with the CALGreen Code and would be compliant with the County's Water Efficient Landscape Ordinance pursuant to RCM UTL-1.

Based on the proposed project's relatively minor contribution to regional and service area water demand and the various water conservation measures to be incorporated into the project's design, water demand generated by the proposed project would be adequately served by the City's Water Division's current and projected water supplies during normal, dry, and multiple dry years. Impacts related to water supplies would be less than significant, and no mitigation is required.

Question 4.23 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?

Response to Question 4.23 c):

Less than Significant Impact. As stated in Response to Question 4.23 a), wastewater generated at the project site is collected, treated, and disposed of by OCSD. The proposed project is not anticipated to result in a substantial increase in wastewater generation within the project site. Furthermore, other than the installation of new 4-inch sewer laterals to be extended as needed from the existing mainline sewer system, the proposed project would not require, nor would it result in, the construction or relocation of new or expanded wastewater treatment or collection facilities. It is anticipated that this existing mainline sewer system would be capable of conveying the flows generated by the proposed project.

Wastewater generated at the project site would be conveyed to OCSD Reclamation Plant No. 1 in Fountain Valley. As previously discussed, Reclamation Plant No. 1 currently operates below capacity and would therefore have the ability to process wastewater generated by the proposed project without exceeding wastewater treatment requirements. Therefore, the proposed project's impacts related to wastewater generation are less than significant, and no mitigation would be required.

Question 4.23 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?

Response to Question 4.23 d):

Less than Significant Impact.

Construction. The proposed project would generate construction waste that would require disposal and processing using local solid waste service systems. OCWR operates a Construction & Demolition (C&D) Program, which requires certain construction projects to divert 65 percent of construction and demolition waste away from landfills.[112] The proposed project would be subject to the C&D Program.

[112] OC Waste & Recycling (OCWR). n.d. Construction & Demolition (C&D) Program. Website: https://www.oclandfills.com/CD (accessed January 15, 2025).

OCWR provides a list of agency-approved haulers and diversion facilities[113] available to transport and process materials waste from construction projects within the County. Pursuant to the C&D Program, construction waste from the proposed project would be hauled and processed by the approved companies to achieve the mandatory 65 percent diversion rate. In addition, as part of the C&D Program, the County shall prepare a Compliance Work Plan, and a Final Compliance Report to be submitted to OCWR upon completion of the proposed project's construction. These documents would assist OCWR in confirming that the proposed project has satisfied the 65 percent construction waste diversion requirement. Upon satisfaction of this requirement, construction of the proposed project would not generate waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Impacts would be less than significant, and no mitigation is required.

Operation. Solid waste disposal needs from operations of the project site would be served by Waste Management (WM) of Orange County. WM provides solid waste, green waste, and recyclable materials hauling services to the County. Waste collected from the project site by WM is ultimately disposed of at one of the three landfills within the OCWR system. These include the Frank R. Bowerman Landfill in the City of Irvine, which accepts commercial waste only; the Olinda Alpha Landfill in the City of Brea, which accepts both public and commercial waste; and the Prima Deshecha Landfill in the City of San Juan Capistrano, which also accepts both public and commercial waste. All three landfills are categorized as Class III landfills and only accept non-hazardous municipal solid waste.[114] In 2019, approximately 3,013,489 tons of solid waste were disposed of between the County's three landfills.[115]

The Frank R. Bowerman Landfill is the closest OCWR landfill to the project site, located at 11002 Bee Canyon Access Road in the City of Irvine, approximately 11 miles from the project site. The Frank R. Bowerman Landfill is permitted to process a maximum of 11,500 tons per day (tpd), with an 8,500 tpd annual average. The landfill has enough projected capacity to serve residents and businesses until approximately 2053.[116] The Frank R. Bowerman Landfill is dedicated solely to commercial waste, and though the proposed project does include a commercial component, this landfill may not accept all waste generated by the proposed project. As such, solid waste hauled from the project site could ultimately end up at the Olinda Alpha Landfill or the Prima Deshecha Landfill in addition to the Frank R. Bowerman Landfill. The Olinda Alpha Landfill has a maximum daily capacity of 8,000 tpd, although the average disposal rate at this landfill is closer to 7,000 tpd. This facility is projected to operate sufficiently until the year 2035.[117] The Prima Deshecha Landfill has a maximum daily capacity of 4,000 tpd, though the site averages approximately 1,400 tpd. This facility is projected to operate through the year 2102.[118] As such, both landfills that could potentially serve the waste disposal needs of the proposed project are currently accepting waste at below-capacity levels. The County adopted an updated Countywide Integrated Waste Management Plan (CIWMP) in 2021,[119] which includes a Siting Element (SE). The SE demonstrates that

[113] OC Waste & Recycling (OCWR). 2024. C&D Debris Diversion Approved Facilities and Franchise Waste Haulers, September. Website: https://oclandfills.com/sites/ocwr/files/2024-10/Final%20C%26D%20Approved%20Facilities%20-%20revised%2009.2024.pdf (accessed January 15, 2025).

[114] County of Orange General Plan Public Services & Facilities Element. 2004. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/59953.pdf (accessed January 15, 2025).

[115] County of Orange Waste & Recycling (OCWR). 2021. Countywide Integrated Waste Management Plan. March. Website: https://oclandfills.com/sites/ocwr/files/2024-09/2021%20CIWMP%20Final.pdf (accessed January 15, 2025).

[116] County of Orange Waste & Recycling (OCWR). n.d. Frank R. Bowerman Landfill. Website: https://oclandfills.com/landfills/frank-r-bowerman-landfill (accessed January 15, 2025).

[117] Ibid.

[118] Ibid.

[119] County of Orange Waste & Recycling (OCWR). 2021. Countywide Integrated Waste Management Plan. March. Website: https://oclandfills.com/sites/ocwr/files/2024-09/2021%20CIWMP%20Final.pdf (accessed January 15, 2025).

the County has at least 15 years of landfill capacity to dispose of non-diverted waste and also sets forth procedures for selecting potential new landfill locations. As such, the County is constantly evaluating its landfills with respect to current and future capacity, and this evaluation has not identified any potential capacity issues that could be exacerbated by the proposed project.

According to the CalEEMod output for the proposed project, it is anticipated that the proposed project would generate 195.4 tons per year, or 0.54 tpd,[120] of solid waste. This amounts to approximately 0.005 percent[121] of the maximum daily capacity of the Frank R. Bowerman Landfill, 0.007 percent[122] of the maximum daily capacity of the Olinda Alpha Landfill, and 0.014 percent[123] of the maximum daily capacity of the Prima Deshecha Landfill. Therefore, the proposed project would not substantially increase solid waste generation within the project site beyond a volume that can be adequately processed by existing regional infrastructure. Based on the daily capacities and long-term operational projections of the landfills potentially serving the project site, solid waste generated during operations of the proposed project would represent a negligible contribution to the daily and long-term capacities of solid waste processed at these facilities. The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local or regional infrastructure. Therefore, the project would result in a less than significant impact with respect to solid waste and landfill facilities, and no mitigation would be required.

Question 4.23 e): Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Response to Question 4.23 e):

Less than Significant Impact. The California Integrated Waste Management Act of 1989 (AB 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995 and 50 percent by 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the State that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020 and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the State's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies to assist the State in reaching its goal.

SB 1383 (2016) establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of the State economy. SB 1383 establishes the following targets to reduce the 2014 statewide level of organic waste that is disposed of: divert and recycle at least 50 percent of all organic waste materials currently disposed at solid waste landfills by January 1, 2020, and at least 75 percent by January 1, 2025. CalRecycle has the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target, which is that no

[120] 195.4 tons per year / 365 days per year = 0.54 tpd
[121] (0.54 tpd / 11,500 tpd) * 100 = 0.005 percent
[122] (0.54 tpd / 8,000 tpd) * 100 = 0.007 percent
[123] (0.54 tpd / 4,000 tpd) * 100 = 0.014 percent

less than 20 percent of currently disposed edible food should be recovered for human consumption by 2025.

As discussed above in Response to Question 4.23 d), the County adopted the CIWMP in 2021. In addition to the SE, the CIWMP also contains a Summary Plan (SP). The SP discusses procedures for each jurisdiction within the County to comply with applicable AB 939 mandates. Further, the proposed project would be consistent with all applicable goals and policies related to waste management included in the City's General Plan Infrastructure Element[124] and the County's General Plan Public Services & Facilities Element,[125] both of which account for the applicable federal, state, and local waste regulations in effect at the time each document was prepared (2015 and 2005, respectively). The proposed project would include four standard solid waste bins per building, for a total of 12 solid waste bins, an easily accessible location within the project site. In addition, the proposed project would include four 96-gallon dedicated organics carts adjacent to the standard waste bins. The inclusion of these carts would allow for the diversion of organic waste from landfills consistent with SB 1383 as described above. As such, the waste generated by operations of the proposed project would not substantially alter diversion rates and would be diverted in accordance with relevant legislature before incorporation into the regional waste stream.

The proposed project would comply with all applicable standards related to solid waste diversion, reduction, and recycling during project construction and operation. Therefore, the proposed project is anticipated to result in less than significant impacts related to potential conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste, and no mitigation would be required.

[124] City of Orange. 2015f. General Plan Infrastructure Element. December. Website: https://www.cityoforange.org/home/showpublisheddocument/204/637698172548000000 (accessed January 15, 2025).

[125] County of Orange. 2004. General Plan Public Services & Facilities Element. Website: https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/59953.pdf (accessed January 15, 2025).

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4.24 *Wildfire*

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

Question 4.24 a): Substantially impair an adopted emergency response plan or emergency evacuation plan?

Response to Question 4.24 a):

Less than Significant Impact. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State through its Fire and Resources Assessment Program (FRAP). CAL FIRE released a set of updated maps on March 24, 2025. These maps designate areas of California as different fire hazard severity zones (FHSZ), based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing densities, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, CAL FIRE is responsible for wildland fire protection for land areas that are generally unincorporated and they are classified as State Responsibility Areas (SRAs). In areas where local fire protection agencies (e.g., Orange

County Fire Authority [OCFA]) are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies all of the City as an LRA.

In addition to establishing local or State responsibility for wildfire protection in a specific area, CAL FIRE categorizes areas into Fire Hazard Severity Zones (FHSZ), including Moderate, High, and Very High classifications. According to the CAL FIRE Local Responsibility Area Fire Hazard Severity Zones map for the City, the majority of the CIty is not designated as a FHSZ.[126] However, the eastern portion of the City contains FHSZ, with the severity level generally increasing from Moderate to High to Very High from west to east. As indicated by a tool developed by CAL FIRE to compare the updated 2025 maps to the older maps that were previously in place, the size of the Very High Fire Hazard Severity Zone (VHFHSZ) within the City has increased based on current designations by the State Fire Marshal.[127] According to a map of the County, the City's northeastern edge is adjacent to a portion of the City of Anaheim designated as VHFHSZ in a SRA, while the eastern and southeastern edges is adjacent to a portion of unincorporated County land designated as VHFHSZ in a LRA.

The project site is approximately 5 miles west of the nearest FHSZs. The project site is located within an urbanized area where wildfire is not considered a likely risk to people or structures. In the event of a fire emergency, Orange City Fire Department Station #6 is located approximately 0.3 mile north of the project site at 345 The City Drive South, meaning the fire response time to the project site would likely be substantially shorter than average Orange City Fire Department response times.

Primary access to the project site would be provided by The City Drive South, which runs in a north-south orientation and is classified as a Principal Arterial roadway in the City's General Plan Circulation and Mobility Element, meaning it is an eight-lane divided roadway.[128] The project site is bound to the north by the existing Theo Lacy Facility, to the east by a vehicle storage lot and the Santa Ana River, to the west by The City Drive South, and to the south by SR-22.

SR-22 is an east-west freeway that crosses through the southern portion of the City. Five SR-22 interchanges are located in the City, including one at The City Drive South, approximately 800 feet west of the project site. Fire access to the project site would be provided either by two driveways along The City Drive South. According to Figure PS-4, Generalized Evacuation Corridors, of the City's Public Safety Element,[129] The City Drive South is designated as an evacuation corridor within the City. However, as noted by the City's Emergency Operations Plan, evacuation routes for emergency situations are contingent upon the scale and location of the emergency and would change depending on the direction of evacuation required by the situation.

Furthermore, the project proposes improvements to The City Drive South, including modifications to the signal, lane geometry, and storage capacities at The City Drive South/West Metropolitan Drive. The existing median on The City Drive South would be modified to provide for a left-turn lane, and an existing monument sign would be relocated further north in the median. Restriping along The City Drive South

[126] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Local Responsibility Area Fire Hazard Severity Zones, City of Orange – Orange County. March 24.

[127] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Compare Old (2007-2011) With New (2025) Recommended FHSZ in LRA. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed April 2, 2025).

[128] City of Orange. 2015e. City of Orange General Plan Circulation and Mobility Element. December. Website: https://www.cityoforange.org/home/showpublisheddocument/192/637698172525970000 (accessed October 17, 2024).

[129] City of Orange. 2015a. City of Orange General Plan Public Safety Element. Website: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000 (accessed October 17, 2024).

and West Metropolitan Drive is proposed to provide for a left-turn lane on The City Drive South and convert an existing left-turn lane on West Metropolitan Drive into a through lane. All equipment associated with construction of the proposed project would be staged within the project site itself and would not interfere with operations of The City Drive South under normal or emergency circumstances.

The proposed project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan.

As discussed in Section 4.21, Transportation, of this IS/MND, the proposed project would not result in a substantial delay in vehicular circulation along The City Drive South. Therefore, operations of the proposed project would not introduce congestion along a designated evacuation route and would not interfere with an established emergency plan.

The OCFD is the fire agency with reviewing authority over the proposed project, as delegated by the State Fire Marshal, for the fire safety design of the proposed structures and access roads. Therefore, the proposed project would be reviewed and approved by the OCFD as part of the design review process to ensure compliance with all applicable codes and ordinances for emergency vehicle access. Therefore, because the project site is not identified by CAL FIRE as facing wildfire risks and the OCFD would review site access plans for the proposed project, impacts of the proposed project to emergency response and evacuation plans would be less than significant, and no mitigation is required.

Question 4.24 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?

Response to Question 4.24 b):

No Impact. As stated in the Response to Question 4.24 a) above, the project site is not within a VHFHSZ or SRA as designated by CAL FIRE. The project site is located in an urbanized portion of the City and is surrounded by existing development. Therefore, the project site faces little to no wildfire risk. As discussed in Section 4.11, Geology and Soils, of this IS/MND, the project site is relatively flat and slopes gently from 0.5 percent to 3.0 percent to the southwest. The proposed project would not introduce any new features to the project site that would exacerbate wildfire risk. Accordingly, the proposed project would have no impact related to pollutants from wildfire or spread of wildfire, and no mitigation is required.

Question 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?

Response to Question 4.24 c):

No Impact. As previously discussed, the project site is located within an urbanized area of Orange and is not located in a VHFHSZ or SRA as designated by CAL FIRE. Therefore, the project site faces minimal wildfire risks.

The project site is currently a vacant disturbed lot; however, underground utilities remain from previous development. Therefore, although the proposed project would include the establishment of new utility connections to serve the proposed structures, the proposed project would not result in any large-scale

infrastructure installation or maintenance that would place the project site at greater risk of wildfire. The proposed project would have no impacts associated with exacerbated wildfire risks, and no mitigation is required.

Question 4.24 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?

Response to Question 4.24 d):

No Impact. As previously discussed, the project site is located within an urbanized area of Orange and is not located in a VHFHSZ or an SRA as designated by CAL FIRE. Therefore, the project site faces little to no wildfire risk, and post-fire conditions are not a concern for the project site. The proposed project does not propose any land use changes within the project site that would include any features that would increase the exposure of people or structures to post-fire risks. Accordingly, the proposed project would have no impact related to post-fire risk conditions, and no mitigation is required.

4.25 *Mandatory Findings of Significance*

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

Question 4.25 a): Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Response to Question 4.25 a):

Less Than Significant with Mitigation Incorporated. Based on the discussion in Section 4.8, Biological Resources, the proposed project is anticipated to result in less than significant impacts related to habitat, wildlife species, and/or plant and animal communities due to the disturbed nature of the project site. As such, with adherence to Regulatory Compliance Measures (RCM) BIO-1 through BIO-3, the proposed project would not threaten or eliminate a plant or animal community, nor would it substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 4.9, Cultural Resources, Response to Question 4.9 a), the project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. Further, the project site is not designated as a historical/archaeological landmark by the City of Orange or the County of Orange. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource.

As discussed in Section 4.9, Cultural Resources, there are no recorded cultural resources within the project site. Mitigation Measure (MM) CUL-1 establishes procedures in the event of the discovery of an unknown cultural resource. With implementation of MM CUL-1, impacts to unknown cultural resources would be less than significant. In addition, as discussed in Section 4.11, Geology and Soils, MM GEO-2 has been incorporated to address the discovery of paleontological resources should they be unearthed during construction. With the application of MM GEO-2 potential impacts to previously undiscovered paleontological resources would be less than significant.

As discussed in Section 4.22, Tribal Cultural Resources, the County sent letters to local Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and have previously requested to be notified of future projects proposed by the County, pursuant to Assembly Bill (AB) 52. The County did not receive any communication from three of the four tribes that requested notification regarding the proposed project. Standard condition measure(s) have been preemptively incorporated into the proposed project that are anticipated to adequately address the concerns of the responding Tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, regarding the proposed project. As such, Standard Condition (SC) TCR-1 and Regulatory Compliance Measure (RCM) CUL-1 are applicable to the proposed project and would reduce potential impacts to tribal cultural resources to a less than significant level.

For the reasons stated above, the proposed project does not 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. Impacts would be less than significant with implementation of the mitigation measures identified above.

Question 4.25 b): Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Response to Question 4.25 b):

Less than Significant With Mitigation Incorporated. A cumulative impact could occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present and reasonably foreseeable future projects for each resource area discussed in this IS/MND. Because physical impacts of the proposed project are generally construction related, the cumulative study area is confined to the general vicinity of the proposed project, including locations that could reasonably utilize the same hauling routes for construction waste. Table 4.25.A below provides a summary of related projects in the vicinity of the project site, which are used in the cumulative impact analysis.

Table 4.25.A: Related Projects

Project	Location	Description	Status
County of Orange			
Orange County Youth Transition Center Juvenile Hall Replacement Project	331 The City Drive South	Proposed overhaul the existing Orange County Juvenile Hall Campus in three phases. Phase 1 would demolish and replace ten buildings and associated infrastructure and construct the new Youth Transition Center (YTC), including associated landscaping, hardscaping, accessibility, and utility improvements. Phase 2 consists of constructing new long-term housing, a new classroom and library building, and a Transitional Age Youth (TAY) housing unit. Phase 3 is still in the design phase but generally consists of constructing and installing tenant improvements to the remaining Campus buildings.	Approved by the Orange County Board of Supervisors in January 2025. Construction began in April 2025 and is expected to last approximately 30 months.
City of Orange			
Watermarke Orange	625 The City Drive South	Demolition of an existing four-story office building and surface parking lot in order to construct a new multi-family apartment building containing a total of 401 units with shared amenities (21 units would be reserved for very low-income households). The new building would be five-stories tall and configured around a multi-level parking structure with 717 parking stalls.	Project design in development. CEQA documentation in process. Construction anticipated to begin in 2027.
Marks Way Orange	164 S Marks Way	Demolition of existing buildings and construction of a new 50-unit affordable senior apartment building, surface parking, and related site improvements.	Project design in development. CEQA documentation in process. Construction anticipated to begin in April 2026.

Sources: OC Public Works, Development Services/Planning (2025); City of Orange, Community Development Department, Planning Division (2025).
sf = square foot/feet

As shown above in Table 4.25.A, there are several other projects planned within the regional vicinity of the project site in the County and the City. Some of these projects involve construction activities that may overlap with the timeline of construction activities under the proposed project. As previously stated, a

cumulative impact could occur if multiple projects contribute haul truck trips to the same regional arterial roadways. However, hauling routes for each project listed in Table 4.25.A, as well as the proposed project, are not necessarily known at this time and may be subject to change based on transportation patterns within the City and the overall region. While these projects could utilize the same major corridors that provide connectivity across the City, these roadways are generally designed to accommodate a higher volume of vehicle traffic that could include haul truck trips. As such, the potential overlap between the construction period of the proposed project and that of the various projects listed in Table 4.25.A is not anticipated to result in cumulatively considerable impacts.

The project site is located in an urbanized area that is predominantly built-out with various commercial and residential uses. Further, the proposed project would replace existing facilities within the project site. The proposed project would rely on and can be accommodated by the existing road system, public services, and large-scale utility infrastructure. Based on the Project Description and the conclusions reached throughout Chapter 4 of this IS/MND regarding each individual environmental factor, impacts related to the proposed project are less than significant or can be reduced to less than significant levels with the incorporation of mitigation measures. Because all potentially significant impacts can be mitigated to a less than significant level, such impacts would not be cumulatively significant. The proposed project's contribution to any significant cumulative impacts would therefore be less than cumulatively considerable with incorporation of the various mitigation measures prescribed within the IS/MND.

Question 4.25 c): Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Response to Question 4.25 c):

Less than Significant With Mitigation Incorporated. Previous sections of this IS/MND reviewed the proposed project's potential impacts, and regulatory compliance measures, standard conditions, and mitigation measures related to Biological Resources (RCMs BIO-1 through BIO-2), Cultural Resources (MM CUL-1 and RCM CUL-1), Geology and Soils (MMs GEO-1 and GEO-2), Hazards and Hazardous Materials (MMs HAZ-1 and HAZ-2), Hydrology and Water Quality (RCMs HYD-1 through HYD-4), Noise (MMs N-1 and N-2, and RCM N-1), Tribal Cultural Resources (SC TCR-1), and Utilities and Service Systems (RCM UTL-1). As concluded in these previous discussions, the proposed project would result in less than significant environmental impacts with adherence to these regulatory compliance measures, standard conditions, and mitigation measures. Therefore, the proposed project would not result in environmental impacts that would cause substantial adverse effects on human beings.

Chapter 5: Mitigation Monitoring and Reporting Program

The following Mitigation Monitoring and Reporting Program has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the County of Orange (County) to ensure that all mitigation measures adopted as part of the County of Orange Workforce Reentry Center Project will be carried out as described in this IS/MND. Because the proposed project is also subject to several regulatory compliance measures and standard conditions, these measures are also included in this section.

Table 5.A lists each of the mitigation measures, regulatory compliance measures, and standard conditions specified in this IS/MND and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 5.A: Mitigation Monitoring and Reporting Program

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
BIOLOGICAL RESOURCES							
RCM BIO-1	**Migratory Bird Treaty Act.** In order to avoid potential impacts to nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, vegetation clearing or construction activities that impact or encroach upon existing vegetation shall be conducted outside the general bird nesting season (February 15 through August 31). If construction occurs during the nesting season, a preconstruction nesting bird survey shall be conducted by a qualified biologist within 3 days prior to vegetation removal or at the beginning of construction activities. If a nest with eggs or young of any species covered under the MBTA or the California Fish and Game Code is found, work shall not be permitted within a buffer distance to be determined by the qualified biologist involved. Commencing project construction activities, including vegetation clearing, outside of the	If construction occurs during the nesting season, a preconstruction nesting bird survey shall be conducted by a qualified biologist.	Three days prior to and during vegetation removal and/or construction activities	Project Applicant/ Construction Contractor			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	primary nesting season for birds reduces the need for preconstruction nesting bird surveys.						
RCM BIO-2	**Street Tree Permit.** Consistent with Section 12.28.020 of the City of Orange Municipal Code, a Street Tree Permit application shall be required and submitted to the City Director of Public Works/City Engineer prior to removal of the three western sycamore trees identified within the median of The City Drive South. The application, as a whole, shall be reviewed and approved by the Public Works Director or City Engineer. The Construction Contractor shall adhere to any instructions provided by the Public Works Director, or City Engineer, regarding Street Trees.	If removal or encroachment into the Tree Protection Zone of the three western sycamore trees identified within the median of The City Drive South occurs, sycamore tree of concern occurs, a Street Tree Permit shall be required.	Prior to Removal of any of the three western sycamore trees in the median of The City Drive South	Construction Contractor			
CULTURAL RESOURCES							
MM CUL-1	**Inadvertent Archaeological Discoveries.** In the event that any cultural resources are encountered during earthmoving activities, all work within 50 feet of the find shall be halted until a qualified archaeologist can evaluate the findings and make recommendations. The archaeologist shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify	In the event that any cultural resources are encountered during earthmoving activities, all work within 50 feet of the find shall be halted until a qualified archaeologist can evaluate the findings	During Earthmoving Activities	Qualified Archaeologist/ Construction Contractor			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	avoidance or other measures as appropriate. If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within the immediate area of the discovery shall be redirected and the find shall be evaluated for significance by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983).	and make recommendations					
RCM CUL-1	**Human Remains.** In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance	In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately and has made a determination of origin and disposition pursuant to applicable laws and regulations.	During Ground Disturbing Activities	County Coroner/ Construction Contractor			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	of grading permits, the Director of the Orange County Public Works Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.						
GEOLOGY AND SOILS							
MM GEO-1	**Compliance with the Recommendations in the Geotechnical Exploration Report.** Prior to the issuance of grading permits, the Director of the County Public Works Department, or their designee, shall verify that requirements and recommendations in the Geotechnical Exploration Report have been appropriately incorporated into the project plans. All grading operations and construction shall be conducted in conformance with all of the recommendations included in the Geotechnical Exploration Report, which was prepared by Verdantas Inc., titled Geotechnical Exploration Report Proposed Workforce Reentry Center 591 The City Drive South City of Orange, California (Geotechnical Exploration Report) (August 7, 2024) as well as any subsequent geotechnical reports prepared for the proposed project. All recommendations found in the Geotechnical Exploration Report shall be incorporated into project design and shall include, but not be limited to: • Site grading recommendations; • Ground improvement recommendations; • Foundation design recommendations; • Flagpole footing recommendations; • Cement type and corrosion protection recommendations; • Retaining wall recommendations; • Paving recommendations; • Infiltration BMP design recommendations;	Grading operations and construction shall be conducted in accordance with the recommendations presented in the Geotechnical Exploration Report.	Prior to the Issuance of Grading Permits	Orange County Public Works – OCPW/ Construction Contractor			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	• Temporary excavation recommendations; • Trench backfill recommendations; and • Drainage and landscaping recommendations. Additional site construction plans, including grading plans, shall be reviewed by the project Geotechnical Consultant prior to construction to check for conformance with all of the recommendations of the Geotechnical Exploration Report. Design, grading, and construction shall be performed in accordance with the requirements of the applicable seismic standards identified in the Geotechnical Exploration Report, as well as the recommendations of the project Geotechnical Consultant as summarized in the Geotechnical Exploration Report, which is subject to review by the Director of the County of Orange Public Works Department, or their designee, prior to the start of grading activities.						
MM GEO-2	**Paleontological Resources.** Prior to the commencement of ground-disturbing activities, a qualified, professional paleontologist who meets the standards set by the Society of Vertebrate Paleontology (SVP) shall be retained to develop a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall be consistent with the guidelines of the SVP and shall include the methods that will be used to protect paleontological resources that may exist within the project limits, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of ground disturbance. If ground-disturbing activities occur in deposits with high paleontological sensitivity (i.e., Young Alluvial Fan Deposits below a depth of 10 feet and Old Alluvial Fan Deposits), those activities shall be	Ground-disturbing activities occurring within deposits that have high paleontological sensitivity shall be conducted in accordance with the PRIMP. If ground-disturbing activities occur in areas with high paleontological sensitivity, paleontological monitoring will occur, and any encountered resources would be identified and stored accordingly.	Prior to Ground Disturbing Activities	Qualified Paleontologist			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	monitored by a qualified paleontological monitor following the PRIMP. If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. Once soils have been monitored during the excavation stage and determined to lack the presence of paleontological resources, monitoring of these soils would no longer be necessary for the remainder of grading activities. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and the paleontologist or paleontological monitor shall be contacted to assess the find for scientific significance. If determined to be scientifically significant, the fossil shall be collected from the field. Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a museum repository. At the conclusion of the monitoring program, a report of findings shall be prepared and submitted to the Director of the County's Public Works Department, or their designee, to document the results of the monitoring program.						
HAZARDS AND HAZARDOUS MATERIALS							
MM HAZ-1	**Compliance with the Recommendations of the Limited Phase II Environmental Site Assessment and Soil Management Plan.** Prior to the issuance of grading permits, the Director of the Orange County Public Works Department, or their designee, shall verify that the requirements and recommendations presented in the Limited Phase II Environmental Site Assessment (ESA) and the Soil Management	Construction and grading activities shall be conducted in accordance with the recommendations presented in the Limited Phase II Environmental Site	Prior to Issuance of Grading Permits	State of California Licensed Abatement Contractor			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition	Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
				Initials	Date	Remarks
Plan (SMP) have been appropriately incorporated into planned construction procedures. Grading operations and construction shall be conducted in conformance with all of the recommendations included in the Phase II ESA, which was prepared by Ninyo & Moore, titled Limited Phase II Environmental Site Assessment, Workforce Reentry Center, 561 The City Drive South (March 28, 2025), as well as the SMP, also prepared by Ninyo & Moore, titled Soil Management Plan, Workforce Reentry Center, 561 The City Drive South (December 6, 2024). All recommendations contained in the Limited Phase II ESA and SMP shall be incorporated into construction protocols and shall include, but not be limited to: • In the event that arsenic, total petroleum hydrocarbons (TPH) diesel range organics (GRO), or tetrachloroethene (PCE), or benzene are encountered during soil disturbance activities, Occupational Safety and Health Administration (OSHA) health and safety guidance and SMP protocols shall be followed; • Adherence to the SMP if soil is to be disturbed during construction activities, including: • Protocols for excavation, temporary stockpiling, handling, and disposal of impacted soil that may be encountered at the site; • Guidance for monitoring requirements to be followed during excavation activities, stockpiling procedures, requirements for excavated soil waste characterization (and any resulting soil disposal requirements), sampling and analytical requirements in the event impacted soil is encountered; and • Soil screening levels which shall be used for comparison to any analytical results obtained,	Assessment (ESA) and Soil Management Plan (SMP).					

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	and any applicable regulatory reporting requirements. Additional site construction plans and procedures, including grading plans, shall be reviewed by the project Geotechnical Consultant prior to construction to check for conformance with all of the recommendations of the Limited Phase II ESA and the SMP. Grading and construction shall be performed in accordance with the requirements of the applicable protocols identified in the SMP, as well as the recommendations of the project Geotechnical Consultant as stated in the Limited Phase II ESA, which shall be reviewed by the Director of the Orange County Public Works Department, or their designee, prior to the issuance of grading permits.						
MM HAZ-2	**Compliance with Recommendations of the Human Health Risk Assessment Technical Memorandum.** Prior to the issuance of grading permits, the Director of the County of Orange Public Works Department, or their designee, shall verify that the requirements and recommendations presented in the Human Health Risk Assessment (HHRA) have been appropriately incorporated into planned construction procedures. Grading operations and construction shall be conducted in conformance with all of the recommendations included in the HHRA, which was prepared by Ninyo & Moore, titled *Human Health Risk Assessment Report and Vapor Intrusion Mitigation Recommendation – Technical Memorandum, April 1, 2025.* All recommendations found in the HHRA shall be incorporated into construction protocols and shall include, but not be limited to: • Impacted soils encountered during construction activities shall be handled in accordance with the SMP; and	Construction and grading activities shall be conducted in accordance with the recommendations presented in the Human Health Risk Assessment (HHRA).	Prior to Issuance of Grading Permits	Project Applicant/Orange County Public Works – OCPW Department, or designee			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	• Installation of a vapor membrane beneath the slab of each proposed building to counteract potential future vapor intrusion.						
HYDROLOGY AND WATER QUALITY							
RCM HYD-1	**Construction General Permit.** Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities,* Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of Orange (County) Public Works Department, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction best management practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion	Prior to construction activities that may affect the project site's drainage characteristics, a NPDES Construction General Permit shall be secured. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit	Prior to Issuance of a Grading Permit	Project Applicant/ Orange County Public Works – OCPW Department, or designee			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.						
RCM HYD-2	**Groundwater Discharge Permit.** If groundwater dewatering is required during construction of the proposed project, the Project Applicant shall submit a Notice of Intent (NOI) for coverage under the permit to the Santa Ana RWQCB at least 60 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters in order to obtain coverage under the Waste Discharge Requirements (WDR) Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality (Groundwater Discharge Permit) (Order No. R8-2020-0006, NPDES No. CAG998001). Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.	If groundwater dewatering is required, a Groundwater Discharge permit shall be secured. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.	60 Days Prior to the Start of Excavation Activities	Project Applicant/Santa Ana RWQCB			
RCM HYD-3	**MS4 Permit.** Prior to the issuance of grading or building permits, the Project Applicant shall submit a Final Water Quality Management Plan (WQMP) to the Orange County Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES *Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region,* Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). The Final WQMP shall be prepared consistent with the requirements of the County of Orange Technical Guidance Document	A Final WQMP shall be submitted to the Orange County Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems	Prior to Issuance of Grading or Building Permits	Project Applicant/ Orange County Public Works – OCPW, or designee			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
	for Water Quality Management Plans (TGD) and the North Orange County Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The County of Orange (County) Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design, and shall implement, maintain and operate all such BMPs in a timely and reasonably diligent manner.	(MS4s). The Final WQMP shall specify the BMPs to be incorporated into the project design.					
RCM HYD-4	**Final Hydrology Report.** Prior to issuance of a grading permit, the Project Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The Project Applicant shall provide the Final Hydrology Report to the Director of the County Public Works Department, or their designee, for review and approval.	A Final Hydrology Report shall be prepared and provided to the County for review and approval.	Prior to Issuance of a Grading Permit	Project Applicant/ Director of the County of Orange Public Works Department, or designee			
NOISE							
MM N-1	**Acoustical Memorandum.** Prior to the issuance of the final occupancy permit, a qualified acoustical consultant shall prepare a memorandum to demonstrate that noise from on-site HVAC equipment does not exceed existing ambient noise levels by 3 A-weighted decibels (dBA) at the closest off-site property to the north and south once the details and specifications of the on-site HVAC equipment are determined.	An acoustical memorandum shall be prepared based on HVAC specifications.	Prior to Issuance of Final Occupancy Permit	Qualified Acoustical Consultant			
MM N-2	**Construction Equipment.** The construction contractor shall restrict heavy construction equipment (e.g., large bulldozers and loaded trucks) or require the use of light construction equipment (e.g., small bulldozers and trucks) within 10 feet from all building structures.	The use of heavy equipment shall be restricted or modified.	During Construction	Construction Contractor			

Regulatory Compliance Measure/Mitigation Measure/ Standard Condition		Monitoring and Reporting Process	Reporting Milestone	Reporting / Responsible Party	Verification of Compliance		
					Initials	Date	Remarks
RCM N-1	**Construction Noise and Vibration.** The construction contractor shall limit construction activities to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday and between the hours of 9:00 a.m. and 8:00 p.m. on Sunday or a federal holiday. Construction is prohibited outside these hours.	Construction activities will only be permitted within a particular time frame (7:00 a.m. and 8:00 p.m., Monday through Saturday; 9:00 a.m. and 8:00 p.m. on Sunday or a federal holiday).	During construction	Construction Contractor			
TRANSPORTATION							
MM TRA-1	**Compliance with Traffic Impact Assessment Recommendations.** Prior to the issuance of a certificate of occupancy, the Director of the Orange County Public Works Department shall ensure that the project conforms to the sight distance recommendations included in the Traffic Impact Assessment (TIA), which was prepared by Linscott, Law & Greenspan, Engineers (LLG), titled *Traffic Impact Analysis Workforce Re-Entry Center, Orange, California, April 14, 2025.* Specifically, the County shall adhere to the following recommendations: • Restripe the proposed outbound lanes to include an additional through lane; and • Adhere to the following restrictions within the Limited Use Areas identified in Figures 9-4 through 9-6 of the TIA: ○ Hardscape and/or landscape shall not exceed a height of 30 inches; ○ Fences or walls of any kind shall not be permitted; ○ Maximum tree trunk size shall be 24 inches in diameter (maximum size at maturity); and ○ Minimum tree spacing shall be 60 feet on center.	The final project design plans shall adhere to the recommendations of the TIA.	Prior to Issuance of a Certificate of Occupancy	Orange County Public Works – OCPW			
TRIBAL CULTURAL RESOURCES							

SC TCR-1	**Unanticipated Discovery of Native American Resources.** If unanticipated archaeological resources or deposits are discovered during ground-disturbing activities, Orange County Public Works (OC Public Works) shall implement the following measures. All work shall halt within a 50-foot radius of the discovery. OC Public Works shall retain a qualified professional archaeologist with knowledge of Native American resources to assess the significance of the find. If the resources are Native American in origin, OC Public Works shall coordinate with the Tribe regarding evaluation, treatment, curation, and preservation of these resources. The archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment in consultation with OC Public Works. Work shall not continue within the no work radius until the archaeologist conducts sufficient research and evidence and data collection to establish that the resource is either: (1) not cultural in origin; or (2) not potentially eligible for listing on the California Register of Historical Resources. If a potentially eligible resource is encountered, then the archaeologist and OC Public Works, as lead agency, in consultation with the Tribe, shall arrange for either: (1) avoidance of the resource, if possible; or (2) test excavations to evaluate eligibility, and if eligible, attempt to resolve adverse effects through implementation of appropriate mitigation, which may include, but shall not be limited to, salvage excavation, laboratory analysis and processing, research, curation, and preparation of a report summarizing the find. The assessment of eligibility shall be formally documented in writing as verification that the provisions in the California Environmental Quality Act for managing unanticipated discoveries and Public Resources Code Section 5024 have been met.	If unanticipated archaeological resources or deposits are discovered during ground-disturbing activities, preservation procedures will be followed.	During Ground Disturbing Activities	Qualified Archaeologist/ Orange County Public Works – OCPW			
UTILITIES AND SERVICE SYSTEMS							

RCM UTL-1	**County of Orange Water Efficient Landscape Ordinance.** Prior to the issuance of any grading or building permit, the Project Applicant shall prepare and submit a Landscape Plan to the Director of the County of Orange (County) Public Works Department, or designee. The Director of the Orange County Public Works Department, or designee, shall confirm that the Landscape Plan for the proposed project is consistent with all applicable provisions outlined in the County's Landscape Water Efficiency Ordinance, as codified in Ordinance No. 16-002.	A Landscape Plan shall be prepared in a manner consistent with all applicable provisions of the County's Landscape Water Efficiency Ordinance.	Prior to Issuance of Grading or Building Permit	Project Applicant			

Chapter 6: References

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Chapter 7: Report Preparation Personnel

7.1 Lead Agency

County of Orange
400 W. Civic Center Dr., 5th Floor
Santa Ana, California 92701

- Ryan Rigali, Real Estate Administrator
- Scott Dessort, Senior Capital Projects Manager
- Virginia Gomez, Senior Environmental Planner

7.2 CEQA Consultant

LSA Associates, Inc.
3210 El Camino Real, Suite 100
Irvine, California 92602

- Ryan Bensley, AICP, Principal in Charge
- Chris Jones, AICP, Associate/Senior Environmental Planner
- Olivia Mattair, Environmental Planner
- Victoria Aispuro, Assistant Environmental Planner
- Amy Fischer, Air Quality Principal
- Jessica Coria, Associate/Director of Air Quality and Climate Change
- Bianca Martinez, Air Quality Specialist
- JT Stephens, Noise Principal
- Jason Lui, Noise Associate
- Corey Knips, Noise Specialist
- Lloyd Sample, Cultural and Paleontological Resources Principal
- Ivan Strudwick, Cultural Resources Associate
- Aaron McCann, Archaeologist
- Kelly Vreeland, Senior Paleontologist
- Blake Selna, Biological Resources Principal
- Jill Carpenter, Senior Biologist
- Jeremy Rosenthal, Senior Biologist
- Meredith Canterbury, Associate/Senior GIS Specialist
- Matt Phillips, Associate/Senior Graphics Designer
- Jason Thomas, Graphics and GIS Specialist

7.3 Geotechnical/Hazardous Materials Consultant

Ninyo & Moore
475 Goddard, Suite 200
Irvine, California 92618

- *Matthew Harrell, Principal Geologist*
- *Michael Putt, Principal Geologist*
- *Jeff Aguilar, Principal Geologist*
- *Soumitra Guha, Principal Engineer*
- *Benjamin White, Project Geologist*

- *Eduardo Chavez, Project Geologist*
- *Jonathan Sachrison, Staff Environmental Scientist*

7.4 Geotechnical Consultant
Verdantas Inc.
2600 Michelson Drive, Suite 400
Irvine, California 92612

- *Jeffrey Pflueger, Associate Geologist*
- *Carl Kim, Senior Principal Engineer*

7.5 Transportation Consultant
Linscott, Law & Greenspan, Engineers
2 Executive Circle, Suite 250
Irvine, CA 92614

- *Richard Barretto, Principal*
- *Shane Green*, *Senior Transportation Engineer*

APPENDIX A

CALEEMOD OUTPUT SHEETS

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APPENDIX B

BIOLOGICAL RESOURCES ASSESSMENT

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APPENDIX C

ARCHAEOLOGICAL RESOURCE EVALUATION

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GEOTECHNICAL REPORTS

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APPENDIX E

PALEONTOLOGICAL RESOURCES ANALYSIS

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HAZARDOUS MATERIALS REPORTS

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APPENDIX G

PRELIMINARY WQMP

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APPENDIX H

PRELIMINARY HYDROLOGY AND DRAINAGE STUDY

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APPENDIX I

NOISE ANALYSIS DATA

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TRAFFIC REPORTS

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APPENDIX K

TRIBAL CONSULTATION RECORD

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