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Program Environmental Impact Report

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

State Clearinghouse No. 2025081123

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Prepared for:

CITY of BREA

Community Development Department
Planning Division
1 Civic Center Circle
Brea, California 92821

Prepared by:

Harris & Associates

101 Progress, Suite 250
Irvine, California 92618

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Acronyms and Abbreviations

°F	degree Fahrenheit
2020 Brea Core ATP	2020 Brea Connecting the Core Active Transportation Plan
AAQS	ambient air quality standards
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADD	average daily demand
ADT	average daily traffic
ADWF	average dry weather flow
AFG	accelerated forecast growth
AFY	acre-feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMI	average median income
amsl	above mean sea level
APE	area of potential effect
APSA	Aboveground Petroleum Storage Act
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ASMD	area-specific management directive
BAU	business-as-usual
BCC	Brea City Code
BCE	Before Common Era
BCSP	Brea Core Specific Plan
BMP	best management practice
Btu	British thermal units
C&D	construction and demolition
CAA	Clean Air Act
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalARP	California Accidental Release Program
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Department of Conservation, Geologic Energy Management Division
CALGreen	California Green Building Standards Code
Cal-OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife

CDMG	California Department of Conservation, Division of Mines and Geology
CDWC	California Domestic Water Company
CE	Common Era
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESA	California Endangered Species Act
CFC	California Fire Code
CFPP	Construction Fire Prevention Plan
cfs	cubic feet per second
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Program
cmbs	centimeters below surface
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CPUC	California Public Utility Commission
CRF	Code of Federal Regulations
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DAMP	Drainage Area Management Plan
DBH	diameter at breast height
DOF	California Department of Finance
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
EV	electric vehicle
FAA	Federal Aviation Administration
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	fire hazard severity zone
FHWA	Federal Highway Administration
FMZ	fuel modification zone

FRAP	Fire and Resource Assessment Program
FTA	Federal Transit Administration
GCC	global climate change
GHG	greenhouse gas
GIS	geographic information systems
GPA	Global Positioning System
gpd	gallons per day
gpm	gallons per minute
GPU	General Plan Update
GSA	groundwater sustainability agency
GSP	groundwater sustainability plan
GWP	global warming potential
H_2S	hydrogen sulfide
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HMBEP	Hazardous Materials Disclosure and Business Emergency Plan
HMP	Hydromodification Management Plan
HOA	homeowners association
HOV	high-occupancy vehicle
HRA	Health Risk Assessment
HU	hydraulic unit
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IEPR	Integrated Energy Policy Report
in/sec	inch per second
IRP	Integrated Water Resources Plan
JRMP	Jurisdictional Runoff Management Program
KVP	key vantage point
kWh	kilowatt-hours
LBP	lead-based paints
LCFS	low carbon fuel standards
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
LHMP	Local Hazard Mitigation Plan
LID	low-impact development
LOS	level of service
LPG	liquefied petroleum gas
LRA	Local Responsibility Area
LUST	leaking underground storage tank
LUSTIS	Leaking Underground Storage Tank Information System
MCL	maximum contaminant level
MDD	maximum daily demand
mg	million gallons
mgd	million gallons per day
MLD	most likely descendant
MMBtu	million British thermal units

MMT	million metric tons
Model Ordinance	Model Water Efficient Landscaping Ordinance
MOE	measure of effectiveness
MPAH	Master Plan of Arterial Highways
mph	miles per hour
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MT CO_2e	metric ton carbon dioxide equivalent
MT/SP	metric tons per service population
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Program
NCCPA	Natural Community Conservation Planning Act
NEHRP	National Earthquake Hazards Reduction Program
NHTSA	National Highway Traffic Safety Administration
NMFS	National Marine Fisheries Service
NO	nitric oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O_3	ozone
OCCHMERA	Orange County-City Hazardous Materials Emergency Response Authority
OCFA	Orange County Fire Authority
OCFCD	Orange County Flood Control District
OCHCA	Orange County Health Care Agency
OCSD	Orange County Sanitary District
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyls
PDWF	peak dry weather flow
PEIR	Program Environmental Impact Report
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
POTW	publicly owned treatment works
PPP	plans, programs, and policies
PPV	peak particle velocity
PRC	California Public Resources Code
PRD	Permit Registration Documents
Proposed Project or Project	Brea 2050: Focused General Plan Update and Brea Core Specific Plan

psi	pounds per square inch
PV	photovoltaic
PVC	polyvinyl chloride
PWWF	peak wet weather flow
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Act Information System
RFS	Renewable Fuel Standard
RPS	Renewable Portfolio Standard
RTP/SCS	2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coast Information Center
SCE	Southern California Edison
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SEMS	Standardized Emergency Management System
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SMP	Sewer Master Plan
SO_2	sulfur dioxide
SOI	sphere of influence
SPCC	spill prevention, control, and countermeasure
SR-	State Route
SRA	State Responsibility Area
STP	shovel test pit
SWAT	Specialized Weapons and Tactics
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resource
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TMDL	total maximum daily load
UBC	Uniform Building Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
UTV	utility task vehicle
UWMP	Urban Water Management Plans
v/c	volume to capacity

VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirements
WMP	Water Master Plan
WQMP	Water Quality Management Plan
WSA	Water Supply Assessment
WUI	wildland-urban interface
ZEV	zero-emission vehicle

Executive Summary

This chapter is an executive summary of the Program Environmental Impact Report (PEIR) for the proposed Brea 2050: Focused General Plan Update (Focused GPU or Brea 2050) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project) prepared in compliance with the California Environmental Quality Act (CEQA). This chapter highlights the major areas of importance in the environmental analysis for the Proposed Project as required by CEQA Guidelines, Section 15123, and also provides a brief description of the Proposed Project, Project objectives, Project impacts and mitigation measures, alternatives to the Proposed Project, and areas of controversy/issues raised by the public known to the City of Brea (City).

Overview

As required by CEQA, this PEIR (1) assesses the potentially significant direct, indirect, and cumulative environmental effects of the proposed project; (2) identifies potential feasible means of avoiding or substantially lessening significant, adverse impacts; and (3) evaluates a range of reasonable alternatives to the proposed project, including the required No Project Alternative. The City is the lead agency for the Proposed Project evaluated in this PEIR and, as such, has the principal responsibility for approving the Proposed Project.

Pursuant to CEQA Guidelines, this Environmental Impact Report is a PEIR that evaluates the effects of the entire project at a programmatic level. This PEIR will be used by the City to evaluate the environmental implications of adopting the Proposed Project. Once certified, this PEIR will also be used to tier subsequent environmental analyses for future development projects within the City.

Project Description

The Proposed Project involves the adoption and implementation of the Focused GPU for the City and its Sphere of Influence (SOI). The Focused GPU constitutes a comprehensive update to the City's existing 2003 Brea General Plan, ensuring its policies and programs align with current community needs, state mandates, and planning principles based on the General Plan Audit prepared in 2023. The Focused GPU includes comprehensive updates to all chapters of the 2003 Brea General Plan, which are now formally designated as “Elements,” instead of “Chapters.” The comprehensive list of the updated goals, policies, and implementation actions is provided in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions. Table ES-1, Proposed Land Use Summary, includes the existing conditions and the proposed Focused GPU land use summary. As detailed in Table ES-1, the Focused GPU would allow for additional housing units and non-residential square footage across various land use categories within the incorporated City limits and SOI.

Table ES-1. Proposed Land Use Summary

GP Designation	Existing Conditions				Proposed General Plan Update				Proposed Change			
	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Cemetery	–	–	–	–	–	–	–	–	–	–	–	–
General Commercial	–	–	285,349	690	–	–	351,758	848	–	–	66,409	158
General Industrial[1]	–	–	4,489,591	10,855	–	–	5,178,449	12,478	–	–	688,858	1,623
High Density Residential	2,556	7,285	–	–	2,677	7,630	–	–	121	345	–	–
Hillside Residential	127	361	–	–	615	1,752	–	–	488	1,391	–	–
Light Commercial[1]	–	–	132,251	320	–	–	135,153	326	–	–	2,902	6
Light Industrial	–	–	7,477,742	18,080	–	–	10,481,374	25,256	–	–	3,003,632	7,176
Low Density Residential	6,668	19,005	–	–	6,775	19,310	–	–	107	305	–	–
Medium Density Residential[1]	1,545	4,403	–	–	1,575	4,489	–	–	30	86	–	–
Mixed Use 18[1]	130	369	160,691	389	256	730	197,495	476	126	361	36,804	87
Mixed Use 50	1,692	4,823	1,752,420	4,237	2,727	7,772	5,047,309	12,162	1,035	2,949	3,294,889	7,925
Open Space[1]	–	–	–	–	–	–	–	–	–	–	–	–
Parcelized ROW[1]	–	–	–	–	–	–	–	–	–	–	–	–
Parks/Recreation	–	–	843,197	2,039	–	–	974,932	2,349	–	–	131,735	310
Public Facilities	–	–	33,598	81	–	–	76,502	184	–	–	42,904	103
Recreational Commercial	–	–	49,657	120	–	–	369,077	889	–	–	319,420	769
Specific Plan – Birch Hills[1]	475	1,353	572,055	1,383	475	1,353	572,055	1,383	0	0	0	0
Specific Plan – Brea 265[1]	–	–	–	–	1,100	3,134	17,424	42	1,100	3,134	17,424	42
Specific Plan – Brea Core (Proposed)	1,417	4,040	5,113,863	12,365	4,752	13,542	6,379,588	15,373	3,335	9,502	1,265,725	3,008
Specific Plan – Brea Industrial[1, 2]	–	–	570,000	1,378	–	–	806,078	1,942	–	–	236,078	564
Specific Plan – Olinda Ranch[1]	622	1,773	–	–	622	1,773	–	–	0	0	–	–
Specific Plan – Tomlinson Park[1]	321	915	–	–	321	915	–	–	0	0	–	–
Specific Plan – Tonner Hills[1]	793	2,259	–	–	793	2,259	–	–	0	0	–	–

Table ES-1. Proposed Land Use Summary

GP Designation	Existing Conditions				Proposed General Plan Update				Proposed Change			
	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
City Limit Total	16,345	46,585	21,480,414	51,937	22,688	64,660	30,587,193	73,709	6,343	18,075	9,106,779	21,772
Hillside Residential[1]	–	–	–	–	1,048	2,987	–	–	1,048	2,987	–	–
Open Space[1]	–	–	–	–	–	–	–	–	–	–	–	–
Parks/Recreation[1]	–	–	–	–	–	–	–	–	–	–	–	–
Public Facilities[1]	–	–	–	–	–	–	–	–	–	–	–	–
SOI Total	–	–	–	–	1,048	2,987	–	–	1,048	2,987	–	–
Grand Total	16,345	46,585	21,480,414	51,937	23,736	67,647	30,587,193	73,709	7,391	21,062	9,106,779	21,772

Notes: NRSF = non-residential square feet; Pop = population; ROW = right-of-way; SOI = Sphere of Influence

[1] These uses are consistent with the 2003 Brea General Plan, and no additional land uses beyond those identified in the 2003 Brea General Plan are proposed under the Focused General Plan Update.

[2] Additional development potential exists within the Brea Industrial Specific Plan area under the existing/adopted Specific Plan; this development potential (beyond existing conditions) is reflected accordingly in the Proposed General Plan Update development potential totals.

Focused General Plan Update

The Focused GPU includes comprehensive updates to the Community Development, Community Resources (merged with Community Services element), and Public Safety Elements, and introduces two new Elements—Mobility and Economic Development—resulting in a total of five updated General Plan Elements as summarized below.

Community Development Element

The Community Development Element serves as a comprehensive blueprint for the physical development of Brea and addresses the building blocks of the community—the land use patterns and intensities, backbone infrastructure, and the visual character of public places and private development. The Community Development Element has been comprehensively updated to address the topics of land use planning, community design and placemaking, neighborhood preservation, hillside development infrastructure, and growth management. The topics of economic development and circulation, which were previously discussed in the 2003 General Plan, are no longer included in the Community Development Element and are instead addressed in the new Economic Development Element and Mobility Element, respectively.

Community Resources Element

The Community Resources Element recognizes Brea's strong sense of community rooted in its commitment to providing exceptional amenities and inclusive services. The City's parks, sports facilities, trails, open spaces, and cultural facilities offer places for residents and visitors to gather, play, and enjoy their lives. These resources, coupled with the City's robust community services,

foster connections among neighbors and create a welcoming environment where residents of all ages and backgrounds can thrive. The Community Resources Element has been comprehensively updated to address the topics of parks and trails, human services, open space, scenic vistas, biological resources, artistic, cultural and historical resources, and education services. The Community Resources Element has been merged with the Community Services Element of the 2003 Brea General Plan, and includes topics previously addressed in the Community Services Element of the 2003 General Plan.

Public Safety Element

The Public Safety Element addresses natural and human-caused hazards in Brea and the potential short and long-term risks to human life, property, and the economic and social disruption resulting from wildfires, earthquakes, landslides, floods, noise exposure, and other hazards. The Public Safety Element works in conjunction with the Brea Local Hazard Mitigation Plan and Emergency Operations Plan, which cover many similar topics including natural hazards and evacuation planning. The Public Safety Element has been comprehensively updated to address the topics of wildland fire, geologic and seismic hazards, flood hazards (including dam failure), hazardous materials, climate change and resiliency planning, emergency preparedness and response, and noise.

Mobility Element

The Mobility Element (also referred to as the Circulation Element), supports the provision of a safe, efficient, and adequate multimodal circulation system. This is a new Element and addresses the topics of regional circulation, local circulation, complete streets, pedestrian and bicycle facilities, and public transportation.

Economic Development Element

The Economic Development Element guides the City's future policy decisions in service of supporting and strengthening the local economy. Although not required by law to be included in the General Plan, the Economic Development Element is included to recognize and promote economic vibrancy and resiliency as a central aspect of planning for Brea's future. This is a new Element and addresses the topics of a diverse and resilient economy, a business-friendly environment, and workforce attraction and retention.

All five elements of the Focused GPU are generally organized to include introduction, existing conditions, and goals sections, with each goal supported by relevant policies and actions. The Focused GPU goals, policies, and actions are included in Appendix C to this PEIR.

Brea Core Specific Plan

The new BCSP encompasses approximately 778.97 acres and has been prepared to implement the values identified in 2017 Brea Envisions Community Strategic Plan and the goals, policies, and recommendations of the 2020 Brea Connecting the Core Active Transportation Plan. The BCSP establishes land uses, as shown on Figure 2-8, Proposed Brea Core Specific Plan Area Zoning; provides mobility recommendations and streetscape improvements; proposes infrastructure upgrades to support new development; and outlines implementation strategies.

The BCSP would allow for the development of 4,752 residential units and approximately 6,379,588 square feet of non-residential uses within the plan area, representing an increase of 3,335 residential units and approximately 1,265,725 square feet of non-residential uses compared to existing conditions.

Project Objectives

In accordance with Section 15124(b) of the CEQA Guidelines, the City has identified the following objectives for the Proposed Project:

1. Preserve, protect, and enhance the City's small-town charm;
2. Continue to provide a community rich in amenities that meet the needs of current and future residents;
3. Accommodate a diverse range of housing development options and densities, ensuring that residents across income levels, age groups, and those with special needs can live within the community;
4. Advance economic development policies that support existing local businesses, attract new businesses, and promote job growth;
5. Encourage the long-term economic success of Downtown Brea and the community's corridors as mixed-use activity nodes;
6. Balance jobs and housing to create an economically sustainable community with reduced impacts on the City's transportation network;
7. Ensure new developments incorporate well-designed site planning, high-quality architecture, and functional outdoor spaces, while ensuring they are compatible with the surrounding setting in terms of land uses, scale, and aesthetics;
8. Preserve the natural environment, including open spaces, hillsides, and wildlife;
9. Maintain adequate, reliable, and essential public infrastructure and facilities, including transportation and utilities to support both existing and future development;
10. Maintain a Circulation Plan that fosters a safe and efficient roadway network by minimizing congestion and providing acceptable operation and level of service for vehicles at intersections and roadways;

11. Maintain and enhance the City's active transportation network to facilitate walking, bicycling, and public transit, improving multimodal connectivity throughout the City;
12. Provide for a wide range of housing opportunities in close proximity to existing and future employment centers and transportation facilities, consistent with the need identified in the City's 2021-2029 Housing Element and local and regional jobs/housing balance policies including SCAG's Connect SoCal through regional programs such as the Sustainable Communities Program and related housing planning initiatives;
13. Support intensification and redevelopment within the Brea Core Area through implementation and adoption of the Brea Core Specific Plan;
14. Provide a focused update to the 2003 Brea General Plan to comply with recent changes to State general plan and housing laws; and
15. Facilitate future use streamlining provisions allowed under the California Environmental Quality Act by providing updated community-level environmental review.

Project Impacts

This EIR examines the potential environmental effects of the Proposed Project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. In accordance with Appendix G of the CEQA Guidelines, the potential environmental effects of the Proposed Project were analyzed for the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils (paleontological resources only)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The following environmental impact issue areas were determined not to result in significant impacts; therefore, they are discussed in Chapter 5, Effects Found Not to Be Significant.

- Agriculture and Forestry Resources
- Geology and Soils (excluding paleontological resources)
- Mineral Resources

- Population and Housing
- Recreation

Table ES-2, Summary of Environmental Impacts and Mitigation Measures, provides a summary of the program-level and cumulative environmental impacts that could result from implementation of the Proposed Project and feasible mitigation measures that could reduce or avoid environmental impacts. For each impact, Table ES-1 identifies the significance of the impact before mitigation (including which phase the mitigation is required), applicable mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

Summary of Environmental Impacts and Mitigation Measures

Table ES-2 summarizes the impacts and mitigation measures addressed in this PEIR. The Proposed Project description and full discussion of impacts and mitigation measures can be found in Chapter 2, Project Description, and Chapter 4, Environmental Analysis, of this PEIR.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Section 4.1, Aesthetics			
Threshold AE-a: Have a substantial adverse effect on a scenic vista.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold AE-b: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold AE-c: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold AE-d: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.2, Air Quality			
Threshold AQ-a: Conflict with or obstruct implementation of the applicable air quality plan.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM AQ-1 Site-Specific Air Quality Analysis and Best Management Practices. Prior to the issuance of a grading or construction permit for individual development projects that are not exempt from California Environmental Quality Act (CEQA), and in conjunction with any required CEQA review, future	Significant and unavoidable.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		project applicants shall submit to the City of Brea Planning Division documentation that the project is consistent with the South Coast Air Quality Management District (South Coast AQMD) mass daily significance thresholds and localized significance thresholds (LSTs) for criteria air pollutant emissions during construction. A project-specific Air Quality Analysis quantifying the potential air emissions of project construction shall be prepared by a qualified air quality professional. This Air Quality Analysis shall demonstrate that criteria air pollutant emissions are below the South Coast AQMD mass daily significance thresholds and LSTs. If the Air Quality Analysis cannot demonstrate that the project is below the South Coast AQMD thresholds before mitigation, the project applicant shall implement practices to reduce VOC and NOX emissions to the extent necessary to reduce emissions to below South Coast AQMD thresholds. Best management practices may include, but are not limited to: • Use equipment with engines that meet, at a minimum, the Tier 4 Final California Emissions Standards, or electric-powered equipment. • Use architectural coatings that meet "Super-Compliant" VOC standards (as defined in South Coast AQMD Rule 1113) and California Green Building Standards Code (CalGreen) requirements under the mandatory measures, or pre-coated materials such as bathroom stall dividers, and metal awnings. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site and at construction offices/trailers.	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated. The project applicant shall provide documentation to the City of Brea detailing the measures that would be implemented and that mitigated emissions would be below South Coast AQMD thresholds. Measures shall be included in project construction documents, and contractors and subcontractors shall implement the applicable South Coast AQMD measures.	
Threshold AQ-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).	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	Mitigation Measure MM AQ-1 is required.	Significant and unavoidable.
Threshold AQ-c: Expose sensitive receptors to substantial pollutant concentrations.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	No mitigation measures are required.	Less than significant.
Threshold AQ-d: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.3, Biological Resources			
Threshold BIO-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	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM BIO-1 Pre-project/Activity Biological Resources Survey/Habitat Assessment. For project sites within vegetation communities and land covers other than "Urban/Developed," as shown on Figure 4.3-2, Vegetation Communities and Land Cover Types, of this Program Environmental Impact Report for the	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.		Brea 2050: Focused General Plan Update and Brea Core Specific Plan, the following requirements shall apply. Prior to the issuance of any construction or clearing, grading, or construction permits for individual development projects that are not exempt from California Environmental Quality Act (CEQA), and in conjunction with any required CEQA review, the future project applicant shall submit one or more documents to the City of Planning Division for review and approval, demonstrating that the project site does not contain native vegetation, sensitive plants, or undisturbed soils. Examples of acceptable documentation include, but are not limited to, the following: • Aerial photographs (historic and current) showing grading, building footprints, paving, and landscaped areas over time to support ornamental status, existing landscape plans • Photographic documentation consisting of georeferenced or dated photographs. • Landscaping plans or as-built drawings demonstrating that vegetation was intentionally planted as part of site development. • Field survey results prepared by a qualified biologist confirming that existing plant species are ornamental and non-native. Within the future site-specific project areas exhibiting native vegetation, a site-specific biological resources survey shall be conducted during the project design phase. The biological resources survey and habitat assessment shall be conducted by a qualified biologist and shall include but not be limited to the following:	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• An analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the proposed project vicinity. • A review of current land use and land ownership within the project vicinity. • An assessment and mapping of vegetation communities present within the project vicinity. If vegetation community mapping has not been conducted on the site in the previous three years, updated vegetation mapping shall be conducted by a qualified biologist as part of the project planning and environmental review process. Vegetation communities shall be mapped according to the Manual of California Vegetation at the alliance level, and a crosswalk table with Holland vegetation communities shall be provided. • A general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site. • An evaluation of potential local and regional wildlife movement corridors. • A focused habitat assessment to determine if the Project area supports vegetation communities that may provide habitat for plant or wildlife species, to be conducted by a qualified biologist, to determine the potential for sensitive plant or wildlife species to occur in or adjacent to the project area. • If the project area supports sensitive vegetation communities, the project proponent shall implement the following weed control methods to minimize the establishment and spread of non-	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		native and invasive weed species in the planning area during construction activities: - Seeds and plant materials used for revegetation shall be certified weed free. - Straw materials, such as those used for erosion control, shall be certified weed free. The results of the biological survey shall be presented in a biological technical report. The survey report shall map and describe the location and extent of observed sensitive resources, including sensitive vegetation communities, plant, and wildlife species within the areas of potential direct and indirect effects for each project area, direct and indirect impacts associated with construction and operation of a project, and the need for further survey, monitoring, or mitigation, including measures pursuant to mitigation measures MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, and MM BIO-7 of this Program Environmental Impact Report.	
		MM BIO-2 Focused Sensitive Plant Species Surveys. If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat, to determine presence/absence of sensitive plant species on the project site. Focused sensitive plant surveys shall be conducted during the species' specific blooming periods to determine presence/absence. If sensitive plant species are mapped within any proposed construction, access, or staging areas, these species shall be quantified and flagged, and these areas shall be modified to avoid direct impacts to mapped sensitive plant species. If significant impacts to these species are unavoidable, the impact on these species	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		shall be reduced to a less than significant level through implementation of one or a combination of the following actions, in accordance with a Conceptual Restoration Plan or acquisition of mitigation credits, reviewed and approved by the City of Brea: • Impacted plants shall be salvaged and relocated to suitable habitat in an on-site restoration area, if possible. If relocation to a restoration area is not practical, the plants shall be relocated off-site to an appropriate location determined by a qualified biologist. • Seeds from impacted plants shall be collected for use at a local off-site location, as applicable. • Off-site habitat that supports the species impacted shall be enhanced or supplemented with seed collected on site. • Comparable habitat at an approved off-site location shall be determined by a qualified biologist and preserved for relocation, enhancement, or transplant of the impacted sensitive plants. Mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include all the following: • Conceptual planting plan prepared by a qualified biologist including grading, planting specifications, and, if appropriate, temporary irrigation. • Planting specifications and fencing and signage to discourage unauthorized access of the planting site. • Monitoring program prepared by a qualified biologist with clearly stated goals and objectives	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		and well-defined performance standards that result in no net loss of sensitive plant resources. Final success criteria shall be determined based on quality, quantity, and species of plant impacted and in consultation with California Department of Fish and Wildlife and U.S. Fish and Wildlife Service depending on the status of the species. The monitoring program will include measures for adaptive management detailing remedial actions if success criteria are not met in the monitoring time frame. Remedial actions may include, but are not limited to, supplemental water, replanting, and herbivore deterrents/protections. MM BIO-3 Sensitive Vegetation Communities Impacts Mitigation. If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, a biological survey shall be conducted to ground-truth and/or update vegetation communities. Any direct impacts to sensitive vegetation communities require mitigation to comply with California Department of Fish and Wildlife authorizations, as well as the ratios defined in any State or Federal permit(s) issued for the proposed project Potential direct impacts to sensitive vegetation communities resulting from project implementation shall be mitigated prior to any vegetation clearing or ground-disturbing activities within the site-specific areas through one of the following three options: a. Vegetation communities and land cover types will be verified in the field during the required biological survey and will be mapped for impact analysis;	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		b. Compensatory mitigation for sensitive habitats shall be satisfied through the acquisition of mitigation bank credits via a resource agency-approved mitigation site within the site's specific watershed or by acquisition of other off-site mitigation credits to be identified and selected in coordination with CDFW. Prior to implementation of project construction impacts (e.g., vegetation clearing or ground-disturbing activities) that would require compensatory mitigation, documentation demonstrating the availability of mitigation credits (i.e., credit ledger) at the approved mitigation site must be submitted to the City of Brea for confirmation; or c. If credits are not available at a resource agency-approved mitigation site within the site's specific watershed or through other off-site mitigation credits, implementation of habitat creation, restoration, enhancement, or preservation shall occur through a Habitat Mitigation and Monitoring Plan developed by a qualified biologist. Under this option, a Habitat Mitigation and Monitoring Plan shall be provided and prepared to achieve no net loss of the resource, be timed in relation to project impacts, and comply with Federal and State mitigation requirements. When proposed mitigation involves habitat enhancement, restoration or creation, the Habitat Mitigation and Monitoring Plan shall include all of the following information: • Conceptual planting plan including planting zones, grading, and irrigation. • Seed mix/planting palette. • Planting specifications.	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• Monitoring program prepared by a qualified biologist including success criteria that ensure no net loss of sensitive vegetation communities. Final success criteria shall be determined based on quality, quantity, and type of habitat impacted and in consultation with CDFW. The monitoring program shall include measures for adaptive management plan detailing remedial actions if success criteria are not met in the monitoring time frame. Remedial actions may include, but are not limited to, supplemental water, replanting, and herbivore deterrents/protections. For mitigation that involves habitat acquisition, the Habitat Mitigation and Monitoring Plan shall include all the following: • Location of proposed acquisition. • Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact. • Documentation that the mitigation area would be adequately preserved and maintained in perpetuity. The identification of mitigation site credits shall be provided to the City of Brea and shall include the following: • Location of approved mitigation site. • Description of the mitigation credits to be acquired, including substantial evidence that the acquired habitat mitigates for the specific maintenance impact. • Documentation of the credits that are associated with a mitigation bank, which has	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		been approved by the appropriate resource agencies. • Documentation in the form of a current mitigation credit ledger.	
		MM BIO-4 Habitat Restoration for Temporary Impacts. If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, temporary impact areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate, following disturbance and prior to Project completion. Habitat restoration and erosion control treatments shall be installed within these short-term impact areas. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence and microplastic- and weed-free straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained by a qualified biologist or restoration specialist for 25 months to ensure adequate establishment and sustainability of the plantings/seedings. Where a project activity involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed immediately, where feasible, and the removal shall be monitored by the qualified monitoring biologist to ensure that dispersal of propagules (e.g., seeds and stems) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the qualified monitoring biologist. Where aboveground plant material cannot be	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		removed (e.g., due to limited access), herbicides shall be applied by a licensed pest control advisor, using chemicals permitted as safe within aquatic environments. MM BIO-5 Qualified Monitoring Biologist. If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, a qualified monitoring biologist shall be retained to implement required monitoring. The qualified monitoring biologist shall be responsible for the following monitoring and reporting tasks. a. Biological Construction Mitigation/Monitoring Exhibit. Prior to the start of construction within the future site-specific project areas that have potential to contain sensitive biological resources, the qualified monitoring biologist shall submit a Biological Construction Mitigation/Monitoring Exhibit, which includes limits of work, proposed monitoring schedule, bird, focused sensitive species, or other wildlife surveys/survey schedules (including general bird nesting and U.S. Fish and Wildlife Service protocol), timing of surveys, bird construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the qualified monitoring biologist. The Biological Construction Mitigation/Monitoring Exhibit shall include the construction site plan, written and graphic depiction of the proposed project's biological mitigation/monitoring program, and a schedule for construction activities. Where the potential for impacts to biological resources is limited (e.g., construction within a footprint that consists entirely of previously developed or disturbed lands), the Biological Construction	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Mitigation/Monitoring Exhibit may be limited to a pre- and post-maintenance verification inspection by a qualified biologist. For highly sensitive resource areas with documented sensitive biological and aquatic resources present, full-time biological monitors may be required, as determined by a qualified biologist. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by the City of Brea prior to the start of construction. b. Resource Marking/Protection. Prior to the start of construction activities within the future site-specific project area, the qualified monitoring biologist shall supervise the placement of orange construction fencing or similar visible marker, staking, or flagging along the limits of the construction area adjacent to sensitive biological habitats, as shown on the Biological Construction Mitigation/Monitoring Exhibit to ensure crews remain within the approved construction limits. These demarcations shall not be required for areas with existing barriers, such as chain-link fencing, along the limits or facilities that are within or adjacent to developed and non-sensitive habitat areas. This task shall include flagging plant specimens and delineating buffers to protect sensitive biological resources (e.g., habitats, sensitive plant and wildlife species, including nesting birds) prior to construction. c. Cover Trenches. The qualified monitoring biologist shall oversee the construction site so that cover and escape routes for wildlife from excavated areas shall be provided daily. All trenches, holes, and excavations during construction shall be covered at night as directed	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		by the monitoring biologist with plywood, metal plates, or other means, and if plastic sheeting is used, the edges must be covered with soils such that small wildlife cannot access the excavated hole. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and before sealing the exposed area) by the qualified monitoring biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. The qualified monitoring biologist shall verify that the contractor has covered all steep-walled trenches or excavations prior to the end of construction daily. If wildlife species are encountered within any trenches or excavated areas, the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape (e.g., a ramp or sloped surface at no greater than a 30-degree angle) and allow the species to disperse. In addition, the qualified monitoring biologist shall provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and equipment and to use best judgment to avoid killing or injuring wildlife (refer to Mitigation Measure BIO-5e). d. Structure and Tree Clearance. Prior to the issuance of any permit to allow for the removal or demolition of trees and existing structures within the survey area (particularly any ornamental trees and existing buildings in the developed land	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		areas), the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season), the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allow the species to disperse. If tree-roosting bats are suspected, slow removal by gently pushing the tree over with heavy equipment is required. e. Pre-Construction Meeting/Education. Prior to the start of any construction activity where the site plan for the construction area indicates that significant impacts to biological resources may occur, as determined by a qualified biologist, a pre-construction meeting shall be held on site with the following in attendance: City of Brea representatives (project planner and building inspector), the construction contractor (if applicable), and the qualified monitoring biologist. At this meeting, the qualified monitoring biologist shall identify and discuss the construction protocols that apply to the proposed activities and the sensitive nature of the adjacent habitat with appropriate project personnel. At the pre-construction meeting, the qualified monitoring biologist shall submit to the City of Brea representatives and construction contractor a copy of the Biological Construction Mitigation/Monitoring Exhibit that identifies areas to be protected, fenced, and monitored. This data shall include all buffer limits, if applicable. Prior to the start of construction activities, the qualified monitoring biologist shall meet with the	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		construction contractor and crew and conduct an on-site educational session regarding the need to avoid impacts outside the approved construction footprint and to protect sensitive plants and wildlife that may occur at the specific facility. This may include but not be limited to explanations of the bird and wetland buffers, the flag system for removal of invasive species or retention of sensitive plants, and clarification of acceptable access routes/methods and staging areas f. Biological Monitoring and Reporting. The qualified monitoring biologist with stop work authority shall inspect/monitor the project construction area in accordance with the approved Biological Construction Mitigation/Monitoring Exhibit. This may be limited to pre- and post-maintenance inspections, weekly visits, or full-time monitoring, as determined by the qualified monitoring biologist and the City of Brea. The qualified monitoring biologist shall document monitoring events via a Consultant Site Visit Record. This record shall be sent to the City of Brea project manager each month. However, if weekly reports are submitted as part of a separate agency permit requirement, these reports may be forwarded to the City of Brea in place of Consultant Site Visit Record submittals. If no deviations from the construction site plan occur during maintenance, no additional documentation is required. However, if deviations from the site plan do occur, such as unanticipated impacts to sensitive vegetation communities or unanticipated discharge of pollutants, a final monitoring report shall be prepared within three months following the completion of mitigation	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		monitoring detailing maintenance and monitoring that occurred, and any remedial or compensatory measures taken. MM BIO-6 Focused Sensitive Wildlife Species Surveys. If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat, to determine presence/absence of sensitive wildlife species within the proposed survey area. If sensitive wildlife species or their habitat are present or potentially present based on biological surveys, the following measures shall be implemented. a. Crotch's bumble bee. Habitat assessment surveys for California Endangered Species Act (CESA) candidate bumble bee species, with a focus on Crotch's bumble bee, followed the California Department of Fish and Wildlife (CDFW) methodology from the Survey Considerations for CESA Candidate Bumble Bee Species dated June 6, 2023 (CDFW Survey Considerations) (CDFW 2023). If no Crotch's bumble bees are found during the focused surveys, but the habitat assessment identified suitable nesting, foraging, or overwintering habitat on the project site, recommendations outlined in the CDFW Survey Considerations will be followed, including recommendations that a biological monitor be on site during vegetation or ground-disturbing activities that take place during any of the Queen and Gyne Flight Period and Colony Active Period. If Crotch's bumble bees are observed, project proponents may propose site-specific measures to avoid take, or consult with	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		CDFW to obtain an incidental take permit if take of CESA-protected bumble bees may occur during project activities. b. Western spadefoot and Monarch butterfly. If western spadefoot or monarch butterfly become listed prior to implementation of future site-specific development projects, focused surveys and consultation with the U.S. Fish and Wildlife Service (USFWS) would be necessary. c. Western burrowing owl. If suitable habitat for western burrowing owl is present (annual grassland and agricultural land), a qualified biologist shall conduct focused surveys of the site and a 500-foot buffer, as access allows. If no burrowing owls are identified, no further measures are necessary. If burrowing owls are detected, active burrows shall be avoided using buffers outlined in the Staff Report on Burrowing Owl Mitigation, dated March 7, 2012, issued by CDFW. If avoidance is not possible, the qualified biologist shall consult with CDFW. No direct disturbance to burrowing owls or their occupied habitat shall occur without appropriate authorization from CDFW. d. Least Bell's vireo. If suitable habitat for least Bell's vireo is present and clearing, grubbing, grading, or other construction activities may occur between March 15 and September 15, the breeding season of the least Bell's vireo, a qualified biologist shall conduct focused surveys for the presence of the least Bell's vireo of the site and areas of potentially suitable habitat within 300 feet or that would be subject to construction noise levels exceeding 60 A-weighted decibels or to the ambient noise level if it already exceeds 60 A-	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		weighted decibel hourly average. If present, measures to minimize noise impacts (such as temporary noise walls/berms) may be required. Noise levels from construction activities during the avian breeding season should not exceed 60 decibels (dBA Leq; or the ambient noise level if they already exceed 60 dBA Leq) at the edge of the occupied habitat. If complete avoidance is not feasible, the qualified biologist shall consult with USFWS. No direct harm to the species shall be allowed without appropriate authorization from USFWS. e. Southwestern willow flycatcher. If suitable habitat for southwestern willow flycatcher is present and clearing, grubbing, grading, or other construction activities may occur between April 15 through September 15, the breeding season of the southwestern willow flycatcher, a qualified biologist shall conduct focused surveys for the presence of the southwestern willow flycatcher of the site and areas of potentially suitable habitat within 500 feet. If the species is determined to be present, consultation per Endangered Species Act with USFWS would be necessary and no activities would occur until authorized by USFWS. No direct harm to the species shall be allowed without appropriate authorization from USFWS. f. Sensitive Bat Species. If suitable roosting habitat (e.g., riparian habitat, snags, wooden buildings, bridges, etc.) for sensitive bat species is present, a qualified biologist shall conduct subsequent focused surveys no less than 14 days prior to removal or disturbance of vegetation or buildings. The survey shall consist of visual and/or acoustic methods as deemed appropriate	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		by the qualified biologist. If no bats are detected, no further measures are necessary. If bat species are detected during surveys, a site-specific plan shall be developed by the qualified biologist. The plan may include, as determined by the qualified biologist, delaying removal of roost habitat until after the maternity roosting period and exclusion of bats from roosting habitat prior to removal of habitat. The qualified biologist shall consult with CDFW prior to implementing any exclusion activities. g. Other Sensitive Species. Prior to any demolition work, construction or grading activities within the future site-specific project areas, pre-construction surveys for other sensitive wildlife species, such as reptiles, may be required to determine presence/absence of sensitive wildlife species within the proposed survey area. MM BIO-7 Focused Nesting Bird Surveys. Project activities that may directly (e.g., vegetation removal, clearing and grubbing, building demolition) or indirectly affect (noise, light, or ground vibration) nesting raptors and other protected bird species shall be timed to avoid the nesting season (January 15 through September 15). If project activities occur within the nesting season, the qualified monitoring biologist shall conduct focused surveys for birds in suitable habitat to determine presence/absence. Surveys shall occur within seven (7) days prior to any construction or grading activities within the future site-specific project areas. Focused sensitive bird surveys shall be conducted during the species' specific nesting seasons to determine presence/absence within the development footprint plus a buffer, if recommended by the qualified monitoring biologist (refer to	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		mitigation measure MM BIO-5). The survey report shall map and describe the location and extent of observed sensitive bird species that would be impacted within the areas of potential effect for each project area. If no nesting birds are documented within the individual activity area, construction shall be allowed to proceed. If nesting birds cannot be completely avoided, a no-disturbance buffer shall be established around the active nest, the size of which will be determined by the qualified monitoring biologist based on species of bird and specific construction activities to take place. The size of the buffer can be reduced in consultation with California Department of Fish and Wildlife. Any work within the buffer shall be avoided until the nest is inactive, as determined by the qualified monitoring biologist.	
Threshold BIO-b: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Less than significant.	Mitigation Measure MM BIO-1, MM BIO-3, MM BIO-4 and MM BIO-5 are required.	Less than significant.
Threshold BIO-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.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	Mitigation Measure MM BIO-1 is required. MM BIO-8 Aquatic Resources Delineation. If potentially jurisdictional aquatic resources are identified during pre-project/activity surveys pursuant to mitigation measure MM BIO-1, a qualified biologist shall conduct a formal aquatic resources delineation following the methods outlined in the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual and applicable Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual to map the extent of wetlands and non-wetland waters,	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in an aquatic resources delineation report. The aquatic resources delineation report shall be used in consultation with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife for necessary authorization or permit, as described in mitigation measure MM BIO-9. MM BIO-9 Potentially Jurisdictional Aquatic Resources Permitting. Temporary and permanent impacts to the wetland and non-wetland waters potentially under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, shall be authorized by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, as applicable. Approved temporary and permanent impacts to the potentially Federal and State jurisdictional aquatic resources in the project area require compensatory mitigation through proposed on- or off-site habitat restoration, creation, or enhancement to the satisfaction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife to achieve a no-net loss of Federal and State jurisdictional wetland and non-wetland waters.	
Threshold BIO-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.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	Mitigation Measure MM BIO-1, MM BIO-3, MM BIO-4, MM BIO-5 and MM BIO-6 are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Threshold BIO-e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	Mitigation Measures MM BIO-1 through MM BIO-9 are required.	Less than significant.
Threshold BIO-f: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.4, Cultural Resources			
Threshold CUL-a: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold CUL-b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM CUL-1 Archaeological Resources Assessment. Prior to the commencement of projects not exempt under California Environmental Quality Act (CEQA) involving ground-disturbing activities (including grading, excavation, trenching, boring, or demolition extending below existing grade) in areas that have not been previously developed or includes unpaved areas, the project proponent shall provide an Archaeological Resources Assessment as part of project-level CEQA review prepared by a qualified archaeologist., The assessment shall be prepared under the supervision of an archaeologist meeting the Secretary of the Interior's professional qualifications standards in prehistoric and/or archaeology. The assessment shall include:	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• A California Historical Resources Information System records search at the South Central Coastal Information Center; • A review of the Native American Heritage Commission Sacred Lands File; and • Evaluation of previous cultural resources investigations and recorded resources within and adjacent to the project site. MM CUL-2 Inadvertent Discovery. If archaeological resources are encountered during ground disturbing activities, work in the immediate area shall cease and an archaeologist meeting the Secretary of the Interior's professional qualifications standards in prehistoric and/or archaeology shall be contacted immediately to evaluate the find(s). If the discovery proves to be significant as determined by the qualified archeologist, procedures outlined in Mitigation Measure MM CUL-6 shall be implemented. MM CUL-3 Evaluation and Mitigation of Significant Archaeological Resources. If potentially significant archaeological resources are identified under Mitigation Measure MM CUL-1 or MM CUL-2, and avoidance is not feasible, a Phase II Testing and Evaluation Program shall be conducted to determine resource significance prior to ground disturbance. Phase II investigations shall be conducted by a qualified archaeologist and in coordination with affiliated California Native American Tribes, where applicable. If archaeological resources are determined to be significant or unique and cannot be avoided, appropriate site-specific mitigation shall be implemented, which may include a Phase III Data Recovery Program. Data recovery shall be conducted in accordance with the Office of Historic	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Preservation's guidelines, including Archaeological Resource Management Reports: Recommended Contents and Format and Guidelines for Archaeological Research Designs. MM CUL-4 Construction Monitoring in High-Sensitivity Areas. If the Archaeological Resources Assessment identifies the project site as highly sensitive for archaeological resources, a qualified archaeologist and a Native American monitor, approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated, shall monitor all ground-disturbing activities in sensitive areas. Prior to construction, the archaeologist shall conduct a worker environmental awareness training addressing the identification and protection of archaeological resources. The Native American monitor shall be invited to participate. If archaeological materials are discovered, work shall cease in the vicinity of the discovery until the resources are evaluated by the qualified archaeologist, in coordination with the Native American monitor and affiliated Tribe(s), as appropriate. The treatment and final disposition of materials shall be determined through Tribal consultation and may include curation, repatriation, or reinterment. MM CUL-5 On-Call Archaeological Monitoring in Moderate-Sensitivity Areas. If the Archaeological Resources Assessment identifies the project site as having moderate sensitivity, a qualified archaeologist shall be retained on an on-call basis. Pre-construction training shall be provided to construction personnel regarding procedures for unanticipated discoveries.	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		If archaeological resources are encountered, construction shall halt in the immediate area, and the on-call archaeologist shall evaluate the discovery and initiate Tribal consultation, where applicable. Appropriate treatment and disposition of materials shall be determined in consultation with affiliated Tribe(s).	
Threshold CUL-c: Disturb any human remains, including those interred outside of dedicated cemeteries.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.5, Energy			
Threshold EN-a: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold EN-b: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.6, Geology and Soils			
Threshold GEO-f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM GEO-1 Prior to issuance of a grading permit for any project that would involve ground-disturbing activities greater than current foundations present on a given site, underlain by Quaternary (Pleistocene and Holocene) terrestrial deposits or older geologic units, or within areas identified as having high or undetermined paleontological sensitivity the project proponent shall retain a qualified professional paleontologist meeting the qualifications of the Society of Vertebrate	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Paleontology to conduct an evaluation to determine the paleontological sensitivity of the geologic units affected by the project and whether ground-disturbing activities would result in a significant impact to paleontological resources according to current Society of Vertebrate Paleontology guidelines. The evaluation shall be submitted to the City of Brea Community Development Department for review and approval. If evaluation determines that the project has the potential to impact paleontological resources, the City of Brea shall require implementation of paleontological mitigation measures recommended by the qualified professional paleontologist to reduce potential impacts to paleontological resources to a less than significant level. These measures may include but not be limited to implementation of a Worker Environmental Awareness Program, on-site paleontological monitoring, and fossil salvage and treatment plans, if applicable. If paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified professional paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the City of Brea to protect the discovered resources. Any paleontological resources recovered shall be provided for curation at a local curation facility such as the Dr. John D. Cooper Archaeological and Paleontological Center or other appropriate repository. The City of Brea Community Development Department shall review and approve the qualified professional paleontologist's findings and recommendation.	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Section 4.7, Greenhouse Gas Emissions			
Threshold GHG-a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant (Cumulative Only)	MM GHG-1 GHG Reduction Plan for Future Development. As part of the development review process for individual development projects that are not exempt from CEQA, the Brea Community Development Department shall require a greenhouse gas (GHG) emissions technical analysis prepared by a qualified environmental professional for all projects exceeding 190 single-family dwelling units, 360 multi-family dwelling units, or 56,000 square feet of non-residential square footage.[1] If the GHG technical analysis shows that construction- or operational-related GHG emissions project will meet or exceed the South Coast Air Quality Management District Interim California Environmental Quality Act GHG Tier 3 Significance Threshold of 3,000 metric ton carbon dioxide equivalent (MT CO_2e) and per capita threshold of 1.5 MT CO_2e per service population, a GHG reduction plan shall be prepared to reduce GHG emissions to below the applicable threshold. The GHG reduction plan shall include potential mitigation measures from the California Air Pollution Control Officers Association Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Mitigation measures shall be selected based on the nature of the project and characteristics of the GHG emission source(s). Potential measures include, but are not limited to the following: • Transportation and Land Use: Mobile GHG emissions can be mitigated through project site location and design, including:	Significant and unavoidable.

[1] Consistent with SCAQMD methodology for the screening levels in Table 3-3 of the Interim CEQA GHG Significance Threshold Draft Guidance Document (SCAQMD 2008), 190 single-family residential units, 360 multi-family residential units, or 56,000 SF of retail development would generate approximately 3,000 MT CO2e annually, assuming default CalEEMod assumptions for Year 2025. See Appendix D for calculation details.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		– Prioritizing infill development with high destination accessibility – Improving destination accessibility – Orient project toward transit, bicycle, or pedestrian facility – Locate project near bike path/bike lane – Provide bike parking, especially near transit – Provide traffic calming measures to encourage pedestrian/bicycle activity – Create urban non-motorized zones – Construct or improve bicycle and pedestrian facilities – Provide first and last mile services to connect project to existing transit or community services, such as a shuttle program – Implement preferential parking permit program for ride-share participants – Provide electric vehicle infrastructure beyond California Green Building Standards Code (CALGreen) requirements – Provide end-of-trip bicycle facilities – Implement a school pool program – Implement telecommute and/or alternative work schedule program – Implement commute trip reduction programs – Implement paid parking – Replace traffic controls with roundabout where appropriate – Incorporate park-and-ride lots – Designate zero emissions delivery zones – Electrify loading docks – Install hydrogen fueling infrastructure for projects that include a fleet fueling component • Green Building Measures: Building design beyond CALGreen requirements can reduce	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		GHG emissions from energy and water use. Some strategies include: – Install whole house fans. – Install energy-saving lighting, heating, cooling systems, and appliances. – Design buildings with passive environmental controls to maximize natural heating and cooling. – Install electric vehicle charging stations to support clean transportation. – Provide on-site renewable energy generation systems and storage – Install electric heat pumps – Implement yard equipment exchange program – Provide electric yard equipment compatibility, such as outdoor outlets – Install green or cool roofs – Provide high efficiency outdoor lighting – Install cool pavement – Eliminate the use of natural gas – Use reclaimed non-potable water for landscaping – Use gray water – Require low-flow fixtures – Design water efficient landscaping – Participate in waste diversion programs • Project Construction: GHG emissions from construction can be reduced through sustainable practices such as the following: – Recycle demolished construction material beyond CALGreen requirements. – Source wood materials from urban wood reuse program – Use local and sustainable building materials	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		– Use local construction contractors – Use cleaner-fuel equipment • Natural/Working Lands: Support carbon sequestration, reduce urban heat island impact, and improve access to local food sources through practices such as the following: – Make public space available for establishment of a local farmers market – Establish areas available for community gardens – Expand urban tree planting – Create new vegetated spaces	
Threshold GHG-b: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.8, Hazards and Hazardous Materials			
Threshold HAZ-a: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ -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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Threshold HAZ -c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ -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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ -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, result in a safety hazard or excessive noise for people residing or working in the project area.	Focused General Plan Update No impact. Brea Core Specific Plan No impact.	No mitigation measures are required.	No impact.
Threshold HAZ -f: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ -g: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Section 4.9, Hydrology and Water Quality			
Threshold HYD-a: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-b: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-c: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and impede or redirect flood flow.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Threshold HYD-d: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-e: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.10, Land Use and Planning			
Threshold LU-a: Physically divide an established community.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold LU-b: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.11, Noise			
Threshold NOI-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.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM NOI-1 **Construction Noise Best Practices.** Prior to any construction activity, such as grading, site preparation, or issuance of building permits, a note shall be provided on the construction plans indicating that during construction activities, the project applicant shall be responsible for requiring contractors to implement the following measures to limit construction-related noise to a performance standard of 80 A-weighted decibel equivalent continuous sound level at the property line of the nearest sensitive receptor:	Significant and unavoidable.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• Brea City Code, Section 8.20.070, limits construction activity to the daytime hours between 7:00 a.m. and 7:00 p.m. on Monday through Saturday. Construction is not allowed on Sundays and Federal holidays. • During the entire active construction period, equipment and trucks used for the project construction shall use the best available noise control techniques (e.g., improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible. • Require that impact tools (e.g., jack hammers and hoe rams) be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. • Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. • Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors. • Construction traffic shall be limited—to the extent feasible—to approved haul routes established by the City of Brea. • Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than five minutes.	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws. • Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the noise standards after other measures have been considered, or occur at nighttime, or when the anticipated construction duration is greater than is typical (e.g., two years or more). MM NOI-2 Roadway Noise Measures. Before the approval of building permits, project applicants for future development projects proposed as a result of the Focused General Plan Update shall evaluate whether projects would have the potential to exceed any of the following thresholds based on the Brea General Plan Community Noise and Land Use Compatibility standards: • Greater than 1.5 A-weighted decibel increase for ambient noise environments of 65 A-weighted decibel Community Noise Equivalent Level and higher. • Greater than 3.0 A-weighted decibel increase for ambient noise environments of 60 to 64 A-weighted decibel Community Noise Equivalent Level. • Greater than 5.0 A-weighted decibel increase for ambient noise environments of less than 60	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		A-weighted decibel Community Noise Equivalent Level. A project that would potentially exceed the above thresholds shall complete a site-specific Noise Technical Study to determine if the project would result in a significant increase in traffic noise. This Noise Technical Study shall be prepared by a qualified acoustical analyst. The following screening levels may be applied to determine whether a Noise Technical Study is required: [2] • If existing roadway segments serving the project have an average daily traffic below 1,800, a Noise Technical Study is required if the project would potentially double segment average daily traffic • If existing roadway segments serving the project have an average daily traffic of 1,800 or higher, a Noise Technical Study is required if the project would generate more than 750 average daily trips If a significant increase in vehicle noise level is identified as a result of individual project implementation, the project shall incorporate buffers or other noise reduction measures to the extent feasible to reduce noise levels at affected sensitive receptors to a normally acceptable noise level. Reduction measures that shall be considered include but are not limited to alternative road design, reduced speeds, alternative paving, building retrofits to provide additional noise attenuation, and setbacks or buffers	

[2] Based on the study area segments, a roadway with 1,800 average daily traffic or higher has the potential to exceed 65 A-weighted decibels and be subject to the 1.5 A-weighted decibel increase thresholds. A more than 750 average daily traffic increase has the potential to result in a 1.5 A-weighted decibel Community Noise Equivalent Level increase. Roadway segment with below 1,800 average daily traffic would generally not generate noise levels above 65 A-weighted decibel Community Noise Equivalent Level and would be subject to the 3 A-weighted decibel Community Noise Equivalent Level or 5 A-weighted decibel Community Noise Equivalent Level thresholds. A doubling of roadway volume typically results in a 3 A-weighted decibel Community Noise Equivalent Level increase in noise level (Caltrans 2013a).

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure		Level of Significance After Mitigation
			before berms and walls. The noise reduction measures shall be designed by a qualified acoustical engineer. Where noise reduction measures in the public right-of-way are infeasible, the project applicant shall conduct outreach to potentially affected sensitive receptors to determine the feasibility of noise reduction measures on private property, including a noise barrier or building retrofits. Based on affected receptor response, a qualified acoustical engineer shall determine the feasibility of a noise barrier on private property and/or the extent of required building retrofits. The project applicant shall submit plans to the City of Brea Community Development Department for review and approval before the start of any construction. These plans shall demonstrate that the proposed noise reduction measures would reduce traffic noise exposure at sensitive receptors to the extent feasible.	
Threshold NOI-b: Generation of excessive groundborne vibration or groundborne noise levels.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM NOI-3	Vibration Best Management Practices. Prior to the start of construction activities requiring a Building Permit that involve typical construction equipment within 100 feet of the property line of occupied neighboring uses or within 165 feet of the property line of occupied neighboring uses with the use of a vibratory roller (or equivalent), the project applicant shall identify best management practices to be implemented by the construction contractor to minimize vibration levels in accordance with the Brea City Code, Section 20.20.040, limit to ground vibration. The best management practices shall be included in project construction documents, including the Grading Plans and contract with the construction contractor. Practices may include but not be limited to the following:	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		• Use only properly maintained equipment with vibratory isolators • Operate equipment as far from sensitive receptors as possible • Use rubber-tired vehicles as opposed to tracked vehicles	
Threshold NOI-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, exposure of people residing or working in the project area to excessive noise levels.	Focused General Plan Update No impact. Brea Core Specific Plan No impact.	No mitigation measures are required.	No impact.
Section 4.12, Public Services			
Threshold PS-a: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-b: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.			
Threshold PS-c: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-d: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-e: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities,	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
need for new or physically altered other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.			
Section 4.13, Transportation			
Threshold TRA-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold TRA-c: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold TRA-d: Result in inadequate emergency access.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.14, Tribal Cultural Resources			
Threshold TCR-a: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM TCR-1 **Provision of Tribal Monitor.** Prior to commencement of any ground-disturbing activities for qualifying development projects in which the potential exists for Tribal Cultural Resources to be present based on record searches or tribal knowledge, the project	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
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: 1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.		applicant shall coordinate with all interested State-recognized Tribes in concurrence with the City of Brea as the California Environmental Quality Act (CEQA) lead agency. A copy of the executed contract shall be submitted to the City of Brea Community Development Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. • The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined by the Consulting Tribe as activities that may include, but are not limited to, pavement removal, potholing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching. The Tribal monitor shall complete daily monitoring logs describing construction activities, locations, soil conditions, and any cultural materials identified. The monitoring shall end when all ground-disturbing activities are completed, or when the qualified archaeologist and/or Tribal monitor determines that all remaining ground-disturbing activities have little to no potential for impacting Tribal Cultural Resources. • Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor. If the resources are Native American in origin, the Consulting Tribe will retain Tribal Cultural Resources in the form and/or manner the Consulting Tribe deems	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		appropriate, for educational, cultural and/or historic purposes. • If human remains and/or grave goods are discovered or recognized at the projects site, all ground disturbance shall immediately cease within 100 feet of discovery, and the county coroner shall be notified per Public Resources (PRC), Code Section 5097.98, and Health and Safety Code, Section 7050.5. Human remains and grave/burial goods shall be treated alike per PRC Section 5097.98(d)(1) and (2). • Work may continue on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines, Section 15064.5(f)). • If a non-Native American resource is determined by the qualified archaeologist to constitute as a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Section 21074(b) for unique archaeological resources. MM TCR-2 Discovery of Cultural Resources (Not Native American in Origin): Prior to commencement of any ground-disturbing activity at the project site, the project applicant shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (National Park Service [NPS] 1983). If cultural resources that are not Native American in origin are encountered	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure		Level of Significance After Mitigation
			during ground-disturbing activities, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. If the discovery proves to be significant as determined by the site archaeologist, additional work such as data recovery excavation may be warranted and shall be reported to the City of Brea Community Development Department.	
Section 4.15, Utilities and Service Systems				
Threshold UTL-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.	Focused General Plan Update Potentially significant. Brea Core Specific Plan Potentially significant.	MM UTL-1	Water and Sewer Infrastructure Improvements. Prior to approval of any discretionary development permit or issuance of building permits, the project applicant shall demonstrate compliance with the City of Brea's Water Master Plan, and Sewer Master Plan, as well as all applicable improvement and design requirements of the City of Brea Public Works Department and the City's Capital Improvement Program (CIP). As part of the development application review process, the applicant shall retain a qualified licensed civil engineer to evaluate existing water and sewer system conditions serving the project site. If the evaluation identifies any capacity deficiencies or facility constraints, the applicant shall prepare and submit the appropriate system testing and modeling (e.g., water flow testing, water hydraulic modeling, sewer capacity modeling and capacity analysis) to the Public Works Department for review and approval. The modeling shall identify the specific infrastructure upgrades, improvements, and associated costs required to ensure adequate service capacity and compliance with City design standards. The applicant shall construct, or fund the construction of, all improvements identified through the approved modeling and required by the Public Works	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
		Department prior to occupancy or in accordance with a timing and phasing plan approved by the City. No development shall be permitted to proceed unless all required improvements or fair-share contributions are secured through conditions of approval, improvement plans, or a development agreement.	
Threshold UTL-b: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold UTL-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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold UTL-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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold UTL-e: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure	Level of Significance After Mitigation
Section 4.16, Wildfire			
Threshold 1: Substantially impair an adopted emergency response plan or emergency evacuation plan.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold 2: 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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold 3: 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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.
Threshold 4: 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.	Focused General Plan Update Less than significant. Brea Core Specific Plan Less than significant.	No mitigation measures are required.	Less than significant.

Summary of Project Alternatives

The CEQA Guidelines (Section 15126.6[a]) state that an EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The alternatives in this PEIR were based, in part, on their potential ability to reduce or eliminate the impacts determined to be significant and unavoidable for implementation of the Proposed Project. Proposed Project alternatives are assessed in further detail in Chapter 7, Alternatives to the Proposed Project.

The following is a description of the three alternatives:

- **Alternative 1:** No Project/Existing 2003 Brea General Plan Alternative
- **Alternative 2:** Proposed General Plan but No Brea Core Specific Plan Alternative
- **Alternative 3:** Reduced Intensity Alternative

Detailed descriptions and an analysis of potential impacts of each alternative are presented in Chapter 7, Alternatives. The environmentally superior alternative would be Alternative 3: Reduced Intensity Alternative, because it would result in the greatest reduction in environmental impacts compared to the Proposed Project.

Alternative 1: No Project/Existing 2003 Brea General Plan Alternative

The discussion of the No Project/Existing 2003 Brea General Plan Alternative must examine the existing conditions and reasonably foreseeable future conditions that would exist if the Proposed Project were not approved (CEQA Guidelines, Section 15126.6[e]). The Alternative 1: No Project Alternative/Existing 2003 Brea General Plan is defined as a continuation of existing conditions and conditions that are reasonably expected to occur in the event that the Proposed Project is not implemented. Under Alternative 1, the Proposed Project would not be adopted, and the land use intensity increases and comprehensive updates to the existing 2003 Brea General Plan and the BCSP would not occur. Instead, Alternative 1 assumes the buildout of the existing 2003 Brea General Plan in accordance with existing land use designations. Therefore, no BCSP adoption would occur. As shown in Table ES-3, Alternative 1: No Project/Existing General Plan Compared to the Proposed Project, this alternative would result in 20,335 housing units (net increase of 3,990 housing units), and 57,954 population (net increase of 11,369 population), 28,476,908 square feet of non-residential area (net increase of 6,996,494 square feet) and 68,624 jobs (net increase of 16,687 jobs) compared to existing conditions. As shown in Table ES-3, Alternative 1 would result in 3,401 fewer housing units (14.33 percent), 9,693 fewer residents (14.33 percent), and 5,085 fewer jobs (6.9 percent) when compared to the Proposed Project.

Table ES-3. Alternative 1: No Project/Existing General Plan Compared to the Proposed Project

Description	Units	Population	NRSF	Jobs
Existing Conditions	16,345	46,585	21,480,414	51,937
Alternative 1: No Project/2003 Brea GP	20,335	57,954	28,476,908	68,624
Proposed Project	23,736	67,647	30,587,193	73,709
Difference: Proposed Project – Alternative 1	-3,401 (-14.3%)	-9,693 (-14.3%)	-2,110,285 (-7%)	-5,085 (-7%)

Alternative 2: Proposed General Plan but No Brea Core Specific Plan Alternative

The Alternative 2: Proposed General Plan but No Brea Core Specific Plan Alternative would eliminate the BCSP project from the Proposed Project. Under Alternative 2, the Focused GPU would be adopted but the land use increased proposed under BCSP would not be included. Instead, the units under the current 2003 Brea General Plan would be assumed within the BCSP area. The proposed goals, policies, and actions of the Focused GPU would not change and be implemented, but none of the BCSP goals and policies would be implemented.

As shown in Table ES-4, Alternative 2: Buildout Projections Compared to the Proposed Project, this alternative would result in 21,445 housing units (net decrease of 2,291 housing units), and 61,118 population (net decrease of 6,529 residents), 30,295,247 square feet of non-residential (net decrease of 291,946 square feet), and 73,005 jobs (net decrease of 704 jobs) compared to the Proposed Project. The purpose of this alternative is to potentially reduce the severity of potential impacts to air quality, GHG emissions, and noise, as overall development of residential and non-residential would be less than what could be developed with the Proposed Project.

Table ES-4. Alternative 2: Buildout Projections Compared to the Proposed Project

	Units	Pop.	NRSF	Jobs
Alternative 2	21,445	61,118	30,295,247	73,005
Proposed Project	23,736	67,647	30,587,193	73,709
Difference	-2,291 (-9.7%)	-6,529 (9.7%)	-291,946 (-1%)	-704 (-1%)

Alternative 3: Reduced Intensity Alternative

The Alternative 3: Reduced Intensity Alternative would reduce the overall intensity of the Proposed Project by 30 percent, including the BCSP development intensity. As shown in Table ES-5, Alternative 3: Buildout Projections Compared to the Proposed Project, this alternative would result in 16,615 housing units (net decrease of 7,121 housing units), and 47,353 population (net decrease of 20,294 residents), 21,411,035 square feet of non-residential (net decrease of 9,176,158 square feet), and 51,596 jobs (net decrease of 22,113 jobs) compared to the Proposed Project. The proposed goals, policies, and actions of the Focused GPU would not change and be implemented. The purpose of this alternative is to potentially reduce the severity of potential impacts to air

quality, GHG emissions, and noise, as overall development of residential and non-residential would be less than what could be developed with the Proposed Project.

Table ES-5. Alternative 3: Buildout Projections Compared to the Proposed Project

	Units	Pop.	NRSF	Jobs
Alternative 3	16,615	47,353	21,411,035	51,596
Proposed project	23,736	67,647	30,587,193	73,709
Difference	-7,121 (30%)	-20,294 (30%)	-9,176,158 (30%)	-22,113 (30%)

Issues to Be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the Proposed Project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this Draft PEIR adequately describes the environmental impacts of the Proposed Project.

2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.

3. Whether the proposed land use changes are compatible with the character of the existing area.

4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.

5. Whether there are other mitigation measures that should be applied to the Proposed Project besides the Mitigation Measures identified in the Draft PEIR.

6. Whether there are any alternatives to the Proposed Project that would substantially lessen any of the significant impacts of the Proposed Project and achieve most of the basic project objectives.

Areas of Controversy

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. The City of Brea has no knowledge of expressed opposition to the Proposed Project. A Notice of Preparation (NOP) was released on August 25, 2025, through September 24, 2025. During the 30-day public review period, a public scoping meeting was held on September 4, 2025, to determine the concerns of responsible and trustee agencies and the community regarding the Proposed Project. Comments from the public and public agencies in response to the NOP are provided in Appendix B. The scoping meeting and NOP comment letters identified concerns related to air quality, greenhouse gas emissions, traffic congestion, noise, parks and recreation, and utilities.

More specifically, concerns focused on ensuring the PEIR comprehensively reflects current conditions, regulatory changes, and realistic growth assumptions. Key issues included incorporating relevant Specific Plans, including the Brea Core Specific Plan, into baseline conditions; accounting for changes in state laws and unforeseen factors since the 2003 General Plan adoption (such as economic shifts, the COVID pandemic, and changes in technology and rise of online retail). Further concerns included the need for the PEIR to address greenhouse gas emissions, climate change, and resilience through updated modeling and General Plan policies; evaluation of traffic impacts using current data, including VMT-based analysis, regional growth, freeway operations, and active transportation; analysis of potential noise impacts; assessment of utility and water infrastructure capacity using adopted planning documents; and evaluation of park and open space impacts, including changes in park acreage and the effects of the BCSP and planned projects that add trails and open space to the Proposed Project.

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Chapter 1 Introduction

The City of Brea (City) has prepared this Program Environmental Impact Report (PEIR) to inform the public, local community, organizations, responsible agencies, trustee agencies, and other interested public agencies about potential significant environmental effects resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project) and possible measures to mitigate those significant effects and alternatives to the Proposed Project. This PEIR was prepared in compliance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), CEQA Guidelines (CEQA Guidelines, Section 15000 et seq.), and the City's procedures for implementing CEQA.

As described in Section 15161 of the CEQA Guidelines, the most common type of EIR is a project EIR, which examines the environmental impacts of a specific development project. As described in Section 15168 of the CEQA Guidelines, program EIRs are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. This EIR is a "Program EIR" pursuant to CEQA Guidelines, Section 15168.

The Proposed Project (i.e., the Focused GPU and BCSP) that is the subject of this PEIR consists of long-term plans that will be implemented over time as policy documents, guiding future development activities and City actions. No specific development projects are proposed as part of the Proposed Project. As a PEIR, it is not project-specific and does not evaluate the impacts of individual projects that may be proposed under both the Focused GPU and BCSP. Subsequent projects will require a separate environmental review, as required by CEQA, which could be in the form of an environmental review that "tiers" off of this PEIR to secure the necessary development permits. CEQA Guidelines, Section 15168(c), states that subsequent activities in a program must be examined in light of the PEIR to determine if an additional environmental document must be prepared. This PEIR assumes that future development consistent with the Proposed Project could be subject to further environmental review at the time specific projects are proposed. The analysis of future actions would be based on existing conditions at the site and vicinity at such times an action is proposed and would take into account any updated information relevant to the environmental analysis of the future projects (e.g., changes to the environmental setting).

Consistent with CEQA Guidelines, Section 15168, this PEIR will facilitate streamlined CEQA review for future actions and development projects that implement or are consistent with the Proposed Project in accordance with the applicable provisions of CEQA and the CEQA Guidelines. Therefore, this PEIR is not intended to address project-specific impacts of individual projects.

1.1 Project Overview

The Proposed Project involves the adoption and implementation of the Focused GPU for the City and its Sphere of Influence. The Focused GPU constitutes a comprehensive update to the City's existing 2003 Brea General Plan, ensuring its policies and programs align with current community needs, State mandates, and planning principles based on the 2023 General Plan Audit. The Focused GPU includes comprehensive updates to all chapters of the 2003 Brea General Plan. The comprehensive list of the updated goals, policies, and implementation actions is provided in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions.

The Proposed Project also includes a new specific plan, the BCSP, which would implement the values identified in the 2017 Brea Envisions Community Strategic Plan and the goals, policies, and recommendations of the 2020 Brea Connecting the Core Active Transportation Plan. The BCSP would establish land uses, provide mobility recommendations and streetscape improvements, propose infrastructure upgrades to support proposed development, and outline implementation strategies for the BCSP area.

1.2 Purpose of the Program Environmental Impact Report

This PEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), and the City of Brea's procedures for CEQA implementation. The primary CEQA Guidelines governing the content and use of this PEIR include Sections 15120 through 15132 (Contents of Environmental Impact Reports), Section 15146 (Degree of Specificity), and Section 15168 (Program Environmental Impact Reports).

The purpose of this PEIR is to evaluate existing environmental conditions, assess the potential environmental effects associated with the adoption and implementation of the Proposed Project (i.e., Focused GPU and BCSP), and identify feasible mitigation measures to avoid or substantially lessen any potentially significant environmental impacts. A detailed description of the Proposed Project is provided in Chapter 2, Project Description.

Consistent with CEQA Guidelines, Section 15146, this PEIR analyzes environmental impacts at a level of detail appropriate for a programmatic planning document. The analysis addresses reasonably foreseeable activities that could occur under the Proposed Project and evaluates both short-term and long-term environmental effects at a programmatic level. The PEIR examines direct, indirect, and cumulative impacts associated with past, present, and reasonably foreseeable future development and provides a comprehensive framework to guide and tier subsequent project-level environmental review, where more site-specific analysis will be conducted as appropriate.

The City of Brea has prepared this EIR as a PEIR pursuant to CEQA Guidelines, Section 15168. A PEIR is appropriate where a series of related actions can be characterized as one large project

and are connected geographically, functionally, or through the adoption of plans, policies, or regulations governing ongoing development. Preparation of this PEIR allows for a broad, policy-level evaluation of environmental effects, alternatives, and mitigation measures applicable to future actions that implement the Proposed Project.

The City prepared the EIR as a PEIR in accordance with CEQA Guidelines, Section 15168, which state the following:

(a) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
  (1) Geographically,
  (2) As logical parts in the chain of contemplated actions,
  (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
  (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

(b) Advantages. Use of a program EIR can provide the following advantages. The program EIR can:
  (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
  (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
  (3) Avoid duplicative reconsideration of basic policy considerations,
  (4) Allow the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts,
  (5) Allow reduction in paperwork.

(c) Use With Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
  (1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.
  (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based

on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

(5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

(d) Use With Subsequent EIRS and Negative Declarations. A program EIR can be used to simplify the task of preparing environmental documents on later activities in the program. The program EIR can:

(1) Provide the basis in an initial study for determining whether the later activity may have any significant effects.

(2) Be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.

(3) Focus an EIR on a later activity to permit discussion solely of new effects which had not been considered before.

Later activities undertaken pursuant to the Proposed Project must be examined in light of this PEIR to determine whether additional environmental documentation is required. If a subsequent activity would result in environmental effects not adequately examined in this PEIR, a new initial study will be prepared to determine whether a subsequent or supplemental EIR, negative declaration, or mitigated negative declaration is required, consistent with CEQA Guidelines, Sections 15162 and 15168(c). Where a subsequent activity is determined, based on substantial evidence, to be within the scope of the program analyzed in this PEIR, no additional environmental document may be required, provided all applicable mitigation measures and performance standards identified in this PEIR are incorporated into project approval.

1.3 Intended Uses of the Program Environmental Impact Report

The City of Brea, as lead agency, has prepared this PEIR to provide the public, responsible agencies, and trustee agencies with an objective, program-level evaluation of the environmental impacts associated with the adoption and implementation of the Focused GPU and BCSP. This PEIR establishes a comprehensive environmental baseline and analytical framework for future discretionary actions that implement or are consistent with the Proposed Project.

This PEIR is intended to serve as an informational document for decision-makers and the public. It does not approve any specific development project. Rather, it identifies potential environmental impacts, feasible mitigation measures, significant and unavoidable effects, and reasonable alternatives, thereby providing the basis for informed decision-making. As required by CEQA, the City of Brea will consider this PEIR, along with other information in the administrative record, prior to taking action on the Proposed Project and will adopt Findings of Fact for each significant environmental effect identified. This PEIR will be circulated for public and agency review and comment, including responsible and trustee agencies with jurisdiction over resources potentially affected by implementation of the Proposed Project. Upon certification, this PEIR may be relied upon by the City and other public agencies in connection with subsequent discretionary approvals that are consistent with the Proposed Project.

Pursuant to CEQA Guidelines, Section 15168(c), subsequent activities must be evaluated in light of this PEIR to determine whether additional environmental review is required. This PEIR anticipates that future development projects consistent with the Proposed Project may be subject to further CEQA review at the time specific proposals are advanced. Such review will be based on site-specific conditions and any updated environmental information relevant at that time.

Consistent with CEQA Guidelines, Sections 15152 and 15168, this PEIR is intended to facilitate streamlined and tiered CEQA review for future actions. Subsequent environmental documents may incorporate this PEIR by reference and focus on site-specific impacts or new significant effects not adequately addressed herein.

CEQA Guidelines, Section 15152(c), recognizes that detailed, site-specific analysis may be infeasible at the planning level and may appropriately be deferred to future project-level review. Accordingly, future environmental documents prepared for individual projects will concentrate on project-specific impacts while relying on this PEIR for analysis of program-wide impacts, cumulative effects, and applicable mitigation measures. Performance standards and mitigation measures identified in this PEIR will be applied, where relevant, to ensure that future projects avoid or reduce environmental impacts to the extent feasible.

CEQA Guidelines, Section 15183, and Public Resources Code, Section 21166, provide for streamlined environmental review of projects that are consistent with the development density and

land use assumptions of an adopted general plan or specific plan for which an EIR has been certified. In accordance with these provisions, this PEIR will support streamlined CEQA review for future projects that are consistent with and implement the Focused GPU and BCSP.

1.4 Lead Agency

In accordance with CEQA Guidelines, Sections 15050 through 15053 and 15367, the City of Brea is the designated lead agency, which is defined as the "public agency which has the principal responsibility for carrying out or approving a project." The lead agency is also responsible for determining the scope of the environmental analysis, preparing the PEIR, and responding to comments received on the Draft PEIR. Before making a decision to approve a project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, the decision-making body has reviewed and considered the information in the PEIR, and the PEIR reflects the independent judgment of the lead agency.

1.5 Program Environmental Impact Report Review Process

1.5.1 Notice of Preparation

In accordance with CEQA Guidelines, Section 15082, a Notice of Preparation (NOP) was circulated for public and public agency review from August 25, 2025, through September 24, 2025 (included as Appendix A). The purpose of the NOP is to provide notification that an EIR for a project is being prepared and to solicit guidance on the scope and content of the document.

Pursuant to CEQA Guidelines, Section 15082, the City held an in-person public scoping meeting on September 4, 2025, at the City of Brea City Hall, Conference Center (2nd floor), 1 Civic Center Circle, Brea, California 92821. Public agencies and members of the public were invited to attend and provide input on the scope of this PEIR. Comments from the public and public agencies in response to the NOP are provided in Appendix B. Table 1-1, NOP Comments Summary, provides a list of the comments received during the NOP public review period.

Table 1-1. NOP Comments Summary

Commenting Agency	Date	Comment Summary	Responses/ PEIR Sections Where Issues Addressed
California Department of Transportation (Caltrans)	September 22, 2025	• Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.	Comment acknowledged and no response is needed.

Table 1-1. NOP Comments Summary

Commenting Agency	Date	Comment Summary	Responses/ PEIR Sections Where Issues Addressed
		• Encourage the use of transit among future residents, visitors, and workers of the proposed areas of developments. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled and improve air quality.	Comment acknowledged and no response is needed.
		• Caltrans supports the integration of the 2020 Core Active Transportation Plan into the new BCSP and encourages objectives of infill, mixed-use, and live/work development.	Comment acknowledged and no response is needed.
		• Caltrans supports the City's plan to implement high-quality Complete Streets that are safe and accessible for people of all ages and abilities. Caltrans also encourages the City to use safety measures such as physically separated sidewalks and bike lanes, pedestrian-oriented LED lighting, high-visibility continental crosswalk striping, raised crosswalks, ADA curb ramps, refuge islands, wayfinding signage, and safe connections to existing and proposed bicycle facilities. These improvements will also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation.	See Section 4.13, Transportation.
		• During any future construction, please ensure that appropriate detours and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users.	See Section 4.13, Transportation.
		• Future projects should not present adverse impacts to the overall transportation system including traffic circulation and the local State. Highway Systems (SHS). If future developments disrupt or impede traffic circulation or the local State Highway System, Caltrans will request a Traffic Impact Analysis (TIA) of these assets.	Comment acknowledged. The Proposed Project involves policy and planning documents and does not involve development projects at this time.
		• When analyzing future proposed projects, please note potential short-and long-term traffic impacts with respect to regional vehicle miles traveled (VMT's), please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.	See Section 4.13, Transportation.
		• Coordination with Caltrans is needed if future impact analysis leads to findings of significance on State facilities,	Comment acknowledged and no response is needed.
		• Any work performed within Caltrans right-of-way (R/W) will require discretionary review and	Comment acknowledged and no response is needed.

Table 1-1. NOP Comments Summary

Commenting Agency	Date	Comment Summary	Responses/ PEIR Sections Where Issues Addressed
		approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.	
		• Project plans and traffic control plans submitted to Caltrans must be stamped and signed by a licensed engineer. Final Environmental Clearance Documentation, and other relevant design documentation will need to be provided when submitting the application to Caltrans.	The Proposed Project involves policy and planning documents and does not involve development projects at this time.
		• Requests to submit all applications and associated documents/plans via email.	No response is needed.
Native American Heritage Commission	August 26, 2025.	• Protocol for evaluation of cultural and historic resources. • Tribal consultation requirements under Assembly Bill 52 and Senate Bill 18.	Section 4.4 Cultural Resources, and Section 4.14 Tribal Cultural Resources
California Department of Forestry & Fire Protection (Cal FIRE)	September 8, 2025.	• Requests a meeting with the City to discuss the CAL FIRE Land Use Planning Program and the related changes to Government Code Section 65302 as it pertains to the Safety Element and the Local Hazard Mitigation Plan.	The comment is specific to the Safety Element being updated as part of the Focused General Plan Update and the related Local Hazard Mitigation Plan. No comments related to the scope of the PEIR were included. No response is needed.
California Geological Survey (CGS)	September 23, 2025.	• Acknowledges that the CGS received the Notice of Preparation.	No response is needed.
		• Advised that CGS has prepared Earthquake Zone of Required Investigation Maps for the Project area and the PEIR should address these zones with respect to the Proposed Project.	See Section 5.2, Geology and Soils, in Chapter 5, Effects Found Not to be Significant.
		• Asks to refer to CGS maps and reports related to mineral land classifications as necessary.	See Section 5.3, Mineral Resources, in Chapter 5, Effects Found Not to be Significant.

1.5.2 Draft Program Environmental Impact Report and Public Review

Pursuant to CEQA Guidelines, Section 15105, this PEIR is being circulated for public review and comment for a period of 45 days. During this period, the public and public agencies can submit comments on this PEIR's accuracy and completeness to the lead agency. The 45-day public review period for this PEIR will be from February 12, 2026, through March 30, 2026. The public can review this PEIR on the City's website at https://www.cityofbrea.gov/166/Projects-in-Process and https://brea.generalplan.org/, as well as at the City's Community Development Department Counter (Planning Division), 3rd floor, 1 Civic Center Circle, Brea, California 92821, and the Brea Community Center, 695 East Madison Way, Brea, California 92821, during normal business hours.

The City of Brea encourages all comments on this PEIR to be submitted in writing. Comments submitted in hard copy/mail to City of Brea, Planning Division, 1 Civic Center Circle, Brea, California 92821, or via email at brea2050@cityofbrea.gov. Please include "CEQA Comments for Brea 2050: Focused GPU and BCSP" in the subject line.

1.5.3 Final Program Environmental Impact Report and Certification

Upon completion of the Draft PEIR public review period, a Final PEIR will be prepared. Pursuant to CEQA Guidelines, Section 15132, the Final PEIR will consist of (1) the Draft PEIR; (2) the comments and recommendations received on the Draft PEIR; (3) a list of people, organizations, and public agencies that commented on the Draft PEIR; (4) the City's responses to significant environmental points raised by the public and agency comments submitted during the review and consultation process; and (5) any other information the City has added to the Draft PEIR. The Final PEIR will also include a Mitigation Monitoring and Reporting Program prepared in accordance with CEQA (California Public Resources Code, Section 21081.6). The Final PEIR will address any revisions to the Draft PEIR made in response to public or public agency comments. These components will compose the Final PEIR for the Proposed Project. Before the City can review the Proposed Project for approval, it must first certify that the PEIR has been completed in compliance with CEQA, that it has reviewed and considered the information in the PEIR, and that the PEIR reflects the independent judgment of the City. The City will also be required to adopt Findings of Fact and a Statement of Overriding Considerations (if any significant, unavoidable impacts are identified). If no significant, unavoidable impacts (assuming the City finds the proposed mitigation measures to be feasible) are identified, the City will not be required to adopt a Statement of Overriding Considerations if it approves the Proposed Project (California Public Resources Code, Section 21081). This PEIR has identified significant and unavoidable impacts; therefore, a Statement of Overriding Considerations is required to be adopted.

1.6 Documents Incorporated by Reference

CEQA Guidelines, Section 15150, allows for incorporation by reference of "all or portions of another document which is a matter of public record or is generally available to the public." Incorporation by reference is used principally as a means of reducing the size of EIRs. This PEIR relies in part on data, environmental evaluations, mitigation measures, and other components of EIRs and plans prepared by City for areas in the Proposed Project vicinity. These documents are listed here and used as source documents for this PEIR. These documents are available for public review during normal business hours (Monday through Friday, 8:00 a.m. to 5:00 p.m., Alternate Fridays are closed) at the City's Community Development Department Counter (Planning Division), 3rd floor, 1 Civic Center Circle, Brea, California 92821. Documents incorporated by reference are as follows:

- 2003 Brea General Plan and 2003 Brea General Plan Environmental Impact Report

- Brea City Code
- 2020 Brea Connecting the Core Active Transportation Plan
- 2017 Brea Envisions Community Strategic Plan

The Draft PEIR also relies on previously adopted regional and Statewide plans and programs, agency standards, and background studies in its analyses, such as the South Coast Air Quality Management District's Air Quality Management Plans and CEQA Air Quality Handbook. Chapter 9, References, provides a complete list of references used in preparing the Draft PEIR.

1.7 Scope of the Program Environmental Impact Report

Based on a review of the Proposed Project and comments received during the NOP public review period, the City determined that a PEIR that addresses the following environmental issue areas should be prepared.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils (paleontological resources only)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The above specific topics evaluated are detailed in Chapter 4, Environmental Analysis (Sections 4.1, Aesthetics, through 4.16, Wildfire), of this PEIR.

As detailed in Chapter 5, Effects Found Not to Be Significant, the City determined that the following environmental impact categories were not significantly affected by or did not affect the Proposed Project:

- Agriculture and Forestry Resources
- Geology and Soils (excluding paleontological resources)
- Mineral Resources
- Population and Housing
- Recreation

This PEIR evaluates direct impacts, reasonably foreseeable indirect impacts, and cumulative impacts resulting from planning, construction, and operation of the Proposed Project using the most current information available and in accordance with the provisions set forth in CEQA and the CEQA Guidelines. In addition, this PEIR recommends potentially feasible mitigation measures, where

possible, and Proposed Project alternatives that would reduce or eliminate significant, adverse environmental effects.

No Impact or Less Than Significant Impact

The PEIR identified the following impacts as less than significant or no impact in the Draft PEIR:

- Aesthetics
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Services
- Transportation
- Wildfire

Less Than Significant with Mitigation Incorporated

The PEIR identified the following impacts as less than significant with the implementation of mitigation measures:

- Biological Resources
- Cultural Resources
- Geology and Soils (paleontological resources only)
- Tribal Cultural Resources
- Utilities and Service Systems

Unavoidable Significant Adverse Impacts

The PEIR identified the following impacts as significant and unavoidable:

- Air Quality
- Greenhouse Gas Emissions
- Noise

1.8 Organization of the Program Environmental Impact Report

This PEIR is organized into two parts. The Draft PEIR addresses the potential environmental impacts of the physical development of the Proposed Project and associated technical appendices in part 1. Subsequent to the public review of the Draft PEIR, when the PEIR is finalized, the Final PEIR will contain the public, organization, and public agency comments received on the Draft PEIR, the City's responses to those comments, a summary of PEIR revisions or enhancements, and the Mitigation Monitoring and Reporting Program for the Proposed Project.

This Draft PEIR includes the following:

Executive Summary. Summarizes the Proposed Project, environmental impacts that would result from implementation of the Proposed Project, proposed mitigation measures that would avoid or reduce impacts, and the level of significance of impacts both before and after mitigation.

Chapter 1, Introduction. Provides an introduction and overview of this PEIR process and describes the intended use and scope of this PEIR and the review process.

Chapter 2, Project Description. Provides a detailed description of the Proposed Project, including its location; background information; Proposed Project objectives; technical, economic, and environmental characteristics; and intended uses for this PEIR.

Chapter 3, Environmental Setting. A description of the physical environmental conditions in the vicinity of the Proposed Project as they existed at the time the NOP was published, from local and regional perspectives. These provide the baseline physical conditions from which the lead agency determines the significance of the Proposed Project's environmental impacts.

Chapter 4, Environmental Analysis. Describes the baseline environmental setting and provides an assessment of potential Proposed Project impacts for each environmental issue area presented. Each section is divided into eight subsections: Environmental Setting; Thresholds of Significance; Plans, Programs, and Policies; Environmental Impacts; Cumulative Impacts; Level of Significance Before Mitigation; Mitigation Measures; and Level of Significance After Mitigation.

Chapter 5, Effects Found Not to Be Significant. Describes the potential impacts of the Proposed Project that were determined not to be significant and were therefore not discussed in detail in this PEIR.

Chapter 6, Other CEQA Considerations. Provides information required by CEQA regarding impacts that would result from the Proposed Project, including significant and unavoidable environmental impacts; significant and irreversible environmental impacts, and growth inducing impacts.

Chapter 7, Alternatives. Describes and compares the proposed alternatives to the Proposed Project.

Chapter 8, List of Preparers and Agencies Consulted. Lists the individuals and agencies that were consulted during the preparation of this PEIR.

Chapter 9, References. Provides a list of references used in preparation of the analysis presented in this PEIR.

Appendices. Includes various documents and data that support the analysis presented in this PEIR.

Chapter 2 Project Description

The purpose of this chapter is to describe the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project) for the public, reviewing agencies, and decision-makers. According to Section 15124 of the California Environmental Quality Act (CEQA) Guidelines, a complete project description must contain the following information: (1) the precise location and boundaries of the project, as shown on a detailed project site map and a regional map; (2) a statement of the objectives sought by the project; (3) a description of the project's technical, economic, and environmental characteristics; and (4) a statement of the intended uses of the Program Environmental Impact Report (PEIR), including discretionary actions. This chapter also includes a list of agencies expected to use the PEIR in their decision-making and a list of permits and other approvals required to implement the Project.

2.1 Project Location and Setting

The Proposed Project encompasses the City of Brea (City) and its Sphere of Influence (SOI). The City's incorporated boundaries and the SOI together compose the Focused GPU planning area (Proposed Project area or Project area). Figure 2-1, Regional Location, shows the Project area in a regional context, and Figure 2-2, City of Brea and Sphere of Influence, illustrates the City's planning boundaries, including the BCSP area. The City is in the northeastern corner of Orange County, where the boundaries of Orange, Los Angeles, and San Bernardino Counties converge. The City is bordered by unincorporated Orange County land and the Los Angeles County line to the north; Chino Hills State Park and the San Bernardin26o County line to the east; the Cities of Yorba Linda, Placentia, and Fullerton to the south; and the City of La Habra to the west. The Orange Freeway (State Route [SR-] 57) and Valencia Avenue (SR-142) bisect the City from north to south. The three major east–west roadways are Imperial Highway (SR-90), Carbon Canyon Road (SR-142), and Lambert Road. The entire Project area encompasses 14,481.9 acres, with 8,249 acres within the incorporated limits of the City and 6,232.9 acres within the SOI.

The BCSP area totals approximately 778.97 acres and is generally bounded by Lambert Road to the north, Imperial Highway (SR-90) to the south, Berry Street to the west, and SR-57 and Associated Road to the east. Refer to Figure 2-2.

2.1.1 Existing Land Uses

The incorporated City of Brea is a largely developed suburban/urban community located in northeast Orange County. The existing land use pattern is mixed and includes established residential neighborhoods, a concentrated downtown and mall/commercial core, industrial and business parks, civic and institutional uses, parks and open space, and transportation corridors. The existing General Plan land use designation categories are shown in Table 2-1, Existing and 2003

Brea General Plan Land Use Summary. Refer to Figure 2-3, Current Land Use Plan, and Figure 2-4, Current Zoning in the City of Brea, for current land uses and existing zoning within the Project area. Dominant land use categories are summarized below.

Residential: A range of single-family and multi-family neighborhoods occupy large portions of the City. Residential uses include older single-family subdivisions to the south and southeast, as well as higher-density multi-family housing concentrated near core commercial corridors and some recent infill project areas.

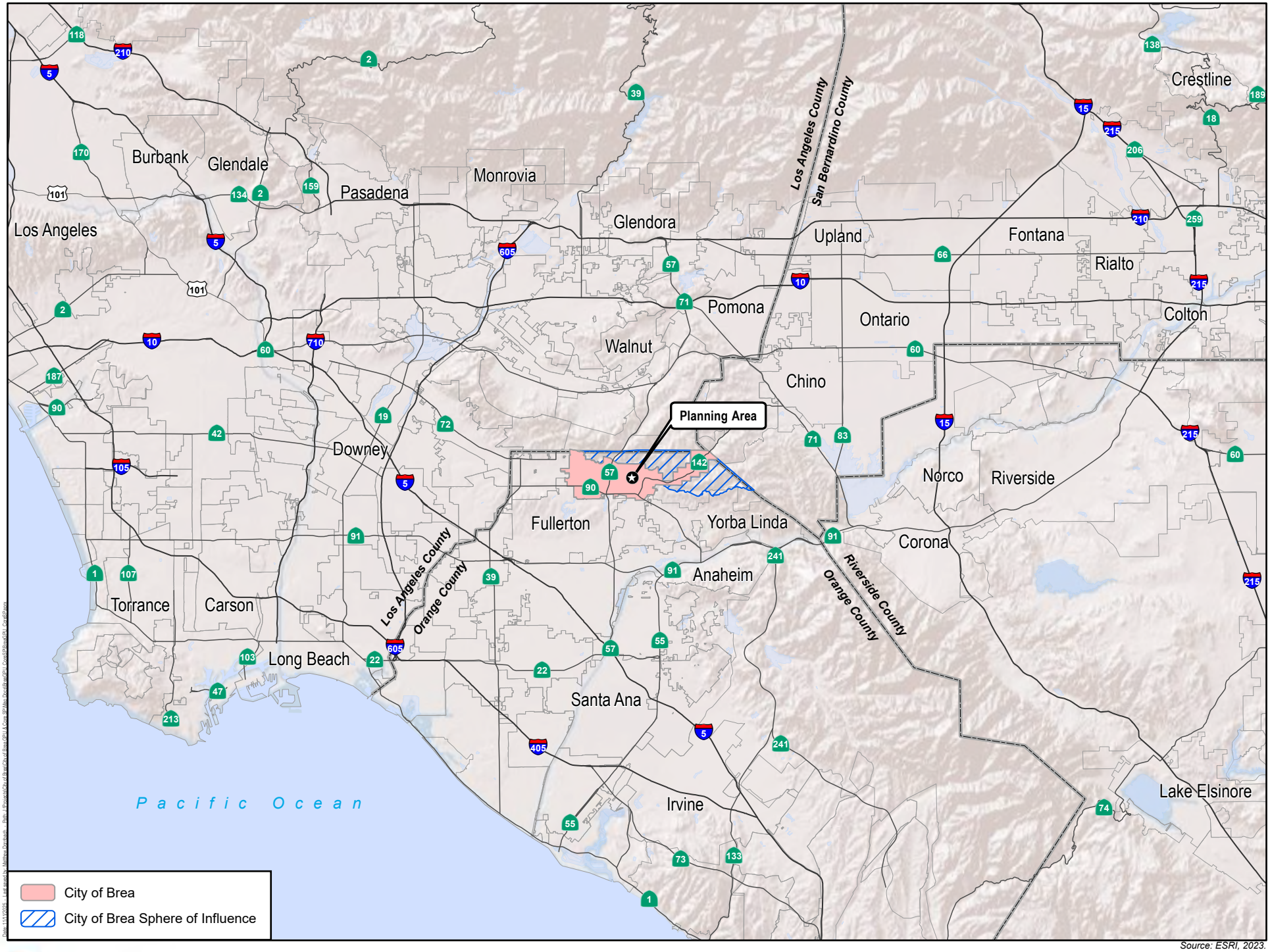
Commercial/Downtown/Retail Core: The Downtown/Civic Center area, retail corridors along Brea Boulevard and Birch Street, and the Brea Mall area represent the primary commercial and employment cores of the City. These areas contain a mix of retail, restaurants, offices, hotels, and civic uses.

Industrial/Business Parks: Industrial and business park land uses are concentrated in the northern and northwestern portions of the City and provide significant local employment.

Parks, Open Space, and Recreation: The City maintains an interconnected system of parks, recreational facilities, and open spaces that serve neighborhood and regional needs.

Institutional and Public Facilities: Schools, municipal buildings, libraries, and other community facilities are distributed throughout the City, with focal concentrations in the downtown/civic area.

The City's SOI encompasses territory outside the City's incorporated boundaries that represents the probable future area for City services and potential annexation. Much of the SOI north of the City is sparsely developed and includes hillside residential areas, public facilities (such as the Brea-Olinda Landfill), parks and recreation areas, open space, and vacant parcels. These areas border the County of Los Angeles. The portion of the SOI south of Carbon Canyon Road is designated as open space as part of Chino Hills State Park, with some undeveloped areas near the San Bernardino County boundary zoned for hillside residential use. As shown in Table 2-1, there is currently no development within the SOI area, and only residential uses are permitted on approximately 34 percent of the total SOI acreage under the current 2003 General Plan. The remaining 4,050 acres (66 percent) are designated for open space, parks/recreation, and public facilities, with no residential or non-residential development potential.



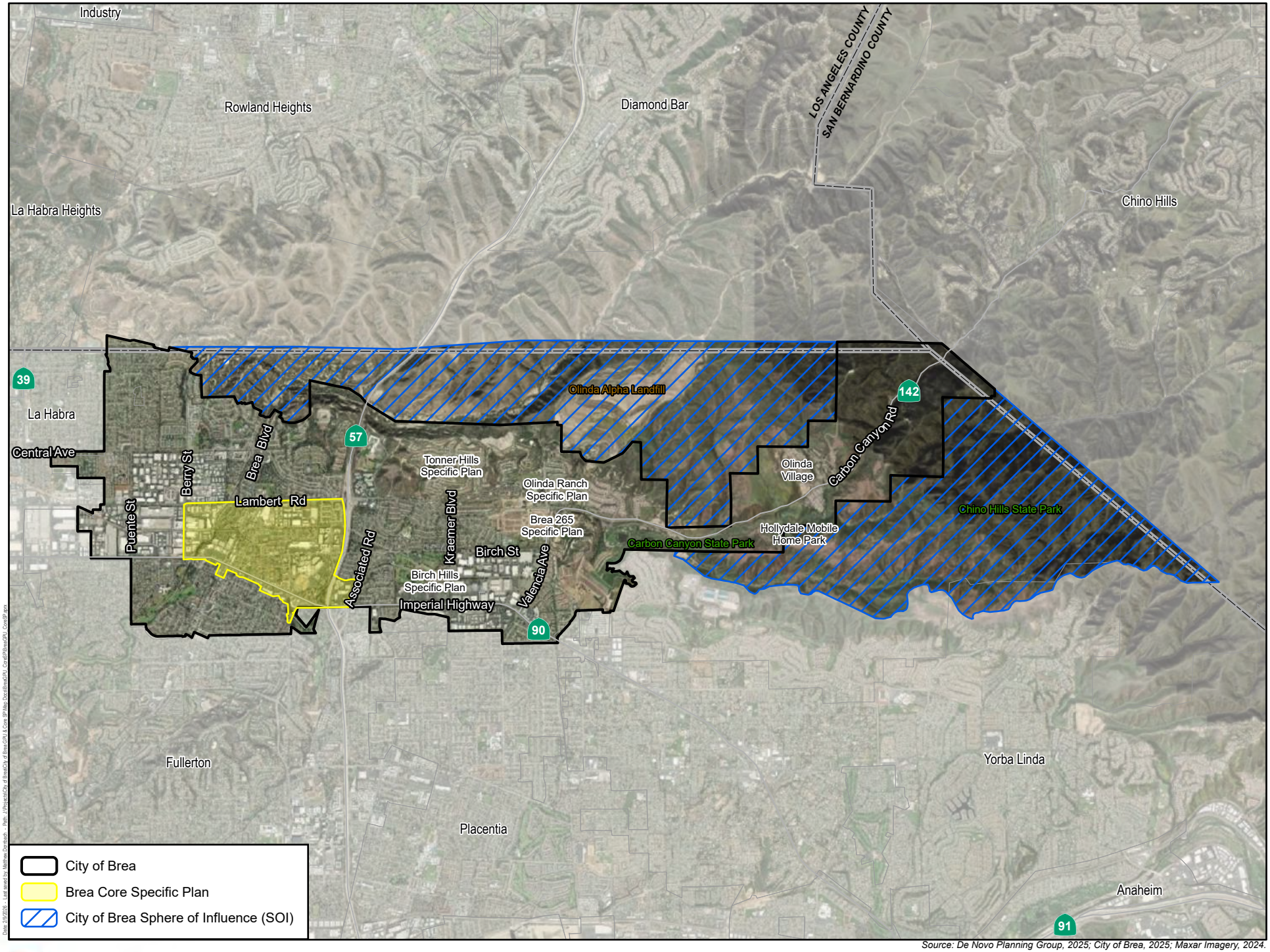
Source: ESRI, 2023.

Harris & Associates

Figure 2-1
Regional Location

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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Source: De Novo Planning Group, 2025; City of Brea, 2025; Maxar Imagery, 2024.

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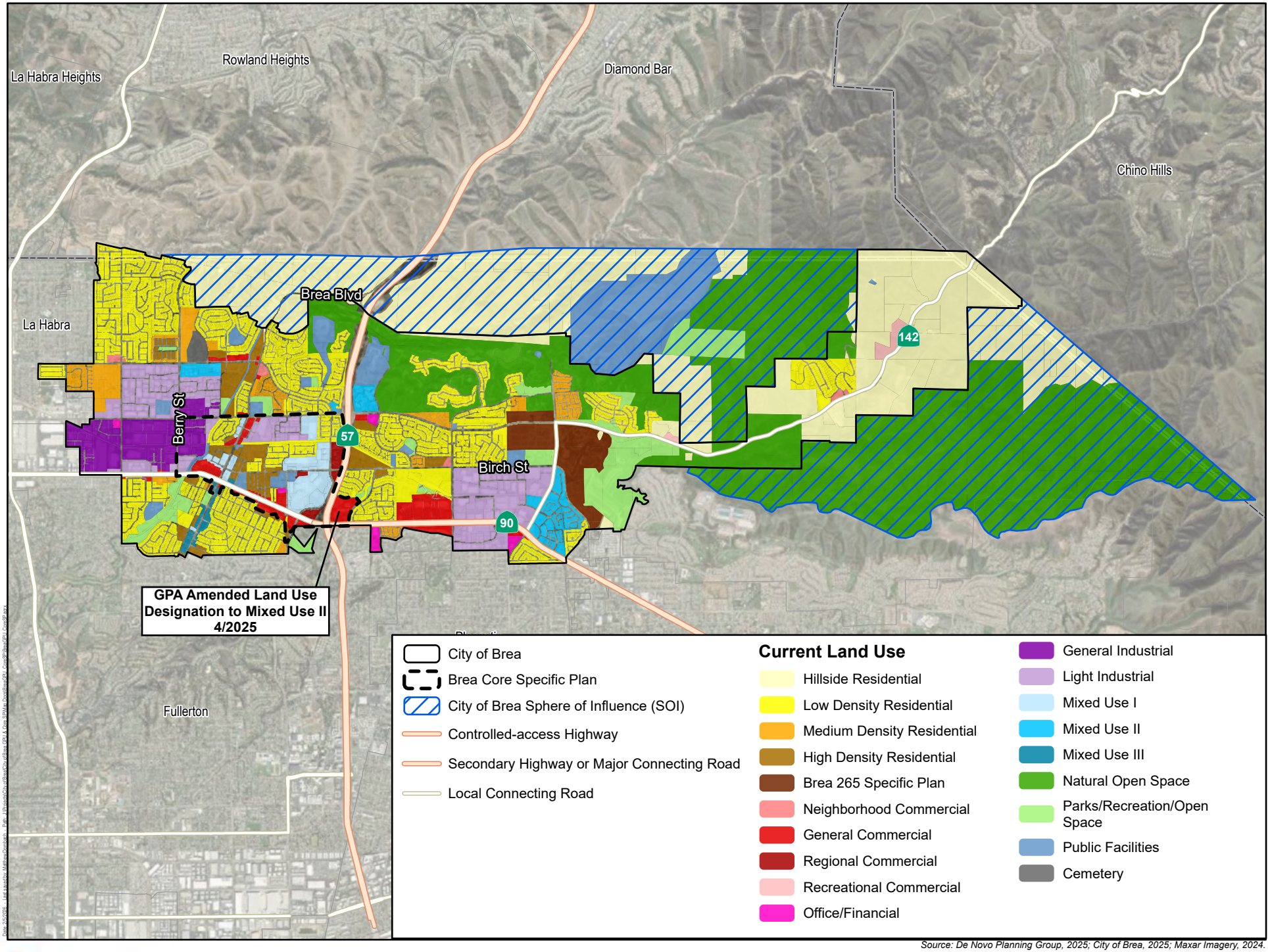
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Figure 2-2

City of Brea and Sphere of Influence

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Source: De Novo Planning Group, 2025; City of Brea, 2025; Maxar Imagery, 2024.

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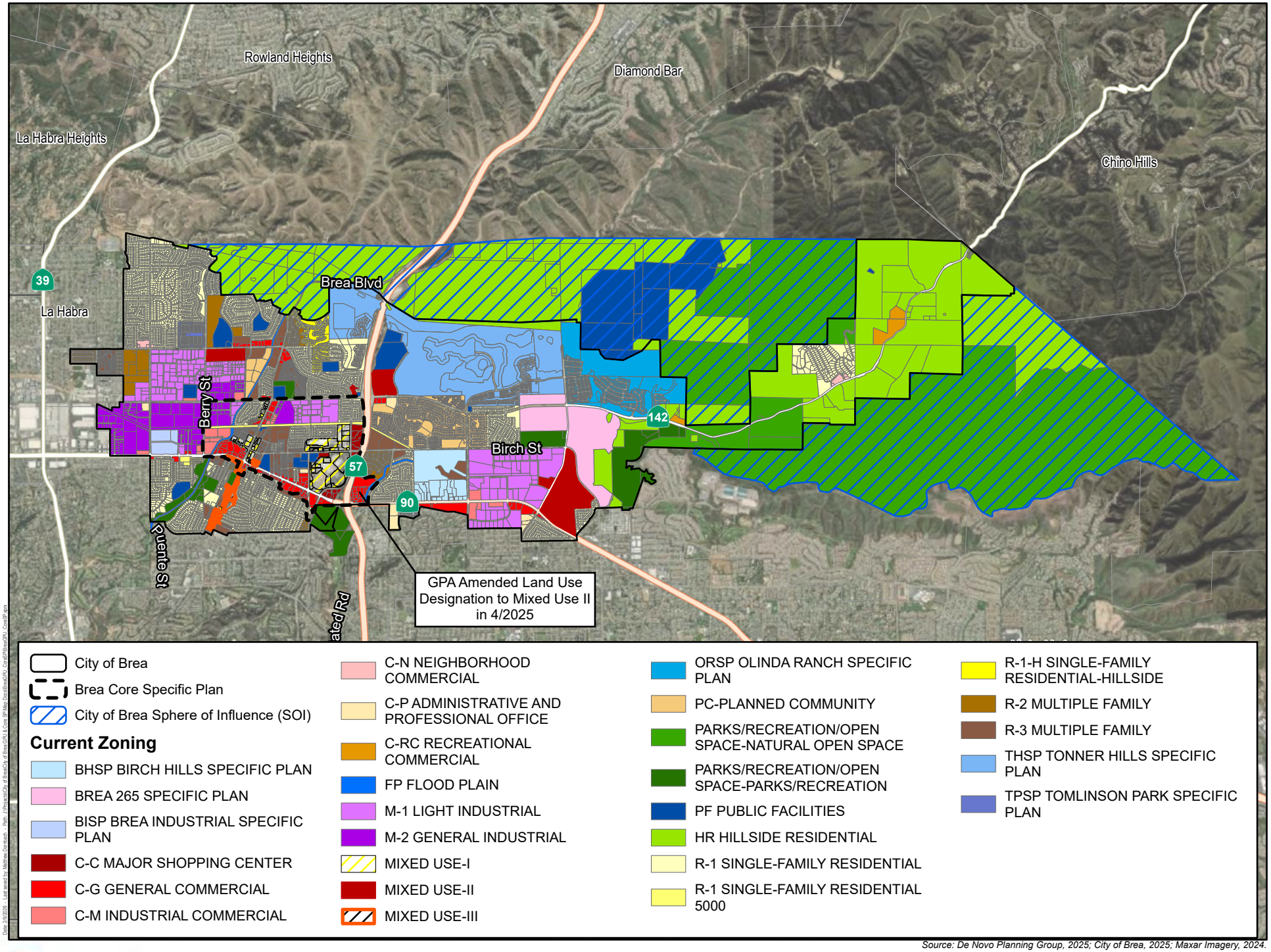
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Figure 2-3

Current Land Use Plan

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Source: De Novo Planning Group, 2025; City of Brea, 2025; Maxar Imagery, 2024.

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Figure 2-4

Current Zoning in the City of Brea

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Table 2-1. Existing and 2003 Brea General Plan Land Use Summary

General Plan Designation	Acreage[1]	Existing Conditions				2003 Brea General Plan			
		Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Cemetery	25	–	–	–	–	–	–	–	–
General Commercial	37	–	–	285,349	690	–	–	362,776	874
General Industrial	233	–	–	4,489,591	10,855	–	–	5,178,449	12,478
High Density Residential	145	2,556	7,285	–	–	2,592	7,388	101,393	244
Hillside Residential	1,230	127	361	–	–	615	1,752	–	770
Light Commercial	14	–	–	132,251	320	–	–	135,153	326
Light Industrial	472	–	–	7,477,742	18,080	–	–	10,481,374	27,073
Low Density Residential	1,442	6,668	19,005	–	–	6,702	19.100	6,819	16
Medium Density Residential	199	1,545	4,403	–	–	1,575	4,489	–	–
Mixed Use 18	23	130	369	160,691	389	256	730	197,495	476
Mixed Use 50	239	1,692	4,823	1,752,420	4,237	1,724	4,913	2,680,921	4,643
Open Space	374	–	–	–	–	–	–	–	–
Parcelized ROW	25	–	–	–	–	–	–	–	–
Parks/Recreation	373	–	–	843,197	2,039	24	69	1,403,516	3,382
Public Facilities	176	–	–	33,598	81	27	78	76,737	185
Recreational Commercial	39	–	–	49,657	120	–	–	369,077	120
Specific Plan – Birch Hills	162	475	1,353	572,055	1,383	475	1,353	572,055	1,383
Specific Plan – Brea 265	257	–	–	–	–	1,100	3,134	17,424	42
Specific Plan – Brea Core Study Area (Proposed)	609	1,417	4,040	5,113,863	12,365	2,461	7,013	6,087,642	14,669
Specific Plan – Brea Industrial[1]	35	–	–	570,000	1,378	–	–	806,078	1,942
Specific Plan – Olinda Ranch	241	622	1,773	–	–	622	1,773	–	–
Specific Plan – Tomlinson Park	28	321	915	–	–	321	915	–	–
Specific Plan – Tonner Hills	741	793	2,259	–	–	793	2,259	–	–
City Limit Total	7,116	16,345	46,585	21,480,414	51,937	19,287	54,967	28,476,908	68,624
Hillside Residential	2,096	–	–	–	–	1,048	2,987	–	–

Table 2-1. Existing and 2003 Brea General Plan Land Use Summary

General Plan Designation	Acreage[1]	Existing Conditions				2003 Brea General Plan			
		Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Open Space	3,382	–	–	–	–	–	–	–	–
Parks/Recreation	118	–	–	–	–	–	–	–	–
Public Facilities	551	–	–	–	–	–	–	–	–
SOI Total	6,147	–	–	–	–	1,048	2,987	–	–
Grand Total	13,263	16,345	46,585	21,480,414	51,937	20,335	57,954	28,476,908	68,624

Notes: SOI = Sphere of Influence; ROW = right-of-way; MU = Mixed Use

[1] Acreages are calculated based on parcels and do not include rights-of-way, except where parcelized.

The incorporated City extends approximately eight miles east to west and about 3.5 miles north to south. Most of the developed area is located west of Valencia Avenue, while the eastern portion consists primarily of residential neighborhoods, with large undeveloped foothills and canyons to the east and north. The general characteristics of existing land uses in the west, central, and east portions of the City are described below:

West: The western portion of Brea, located west of SR-57, includes low-density residential neighborhoods near the northern and southern borders, with light and general industrial uses and higher-density residential development in the central area. The BCSP area is currently developed with single- and multi-family residential units, public facilities, industrial, institutional, office, mixed uses, and a variety of commercial and retail uses.

Central: The central portion of Brea, located east of SR-57 and west of Carbon Canyon Regional Park, includes single- and multi-family residential neighborhoods and specific plans such as the Tonner Hills Specific Plan, Birch Hills Specific Plan, Olinda Ranch Specific Plan, Brea 265 Specific Plan, as well as industrial, commercial, and park and recreational uses, along with Carbon Canyon Regional Park.

East: The eastern portion of Brea, located east of Carbon Canyon Regional Park, consists primarily of park and open space areas. Carbon Canyon Road (SR-142) serves as the main roadway, with limited development including the Olinda Village single-family residential neighborhood, some neighborhood commercial uses, the Hollydale Mobile Home Park, and a single-family residence with stables within an area zoned for recreational commercial use. The remaining areas are largely undeveloped and designated for hillside residential use.

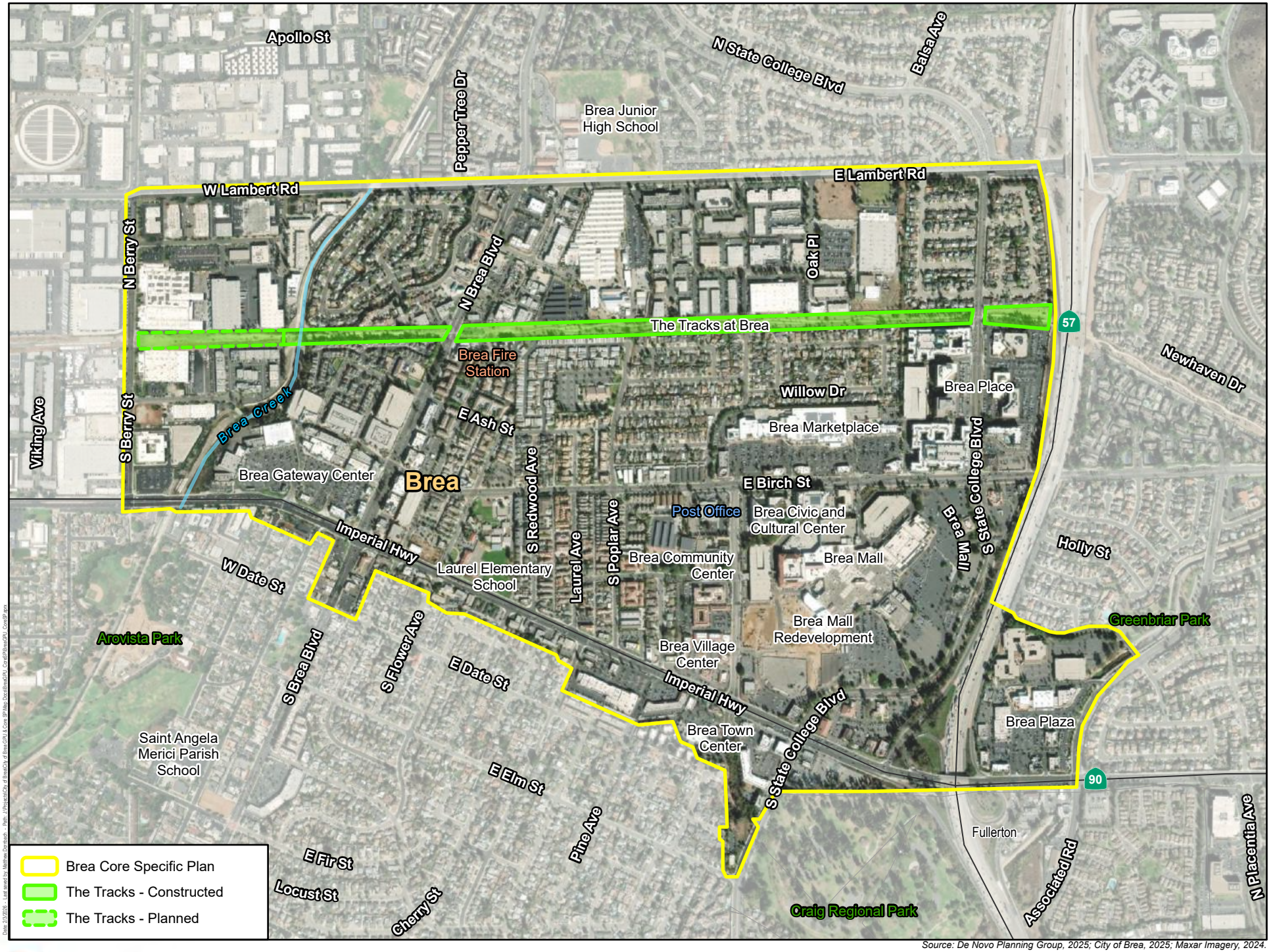
The City's SOI encompasses territory outside the City's incorporated boundaries that represents the probable future area for City services and potential annexation. Much of the SOI north of the City is sparsely developed and includes hillside residential areas, public facilities (such as the Olinda Alpha Landfill), parks and recreation areas, open space, and vacant parcels. These areas border the County of Los Angeles. The portion of the SOI south of Carbon Canyon Road is

designated as open space as part of Chino Hills State Park, with some undeveloped areas near the San Bernardino County boundary zoned for hillside residential use. As shown in Table 2-1, there is currently no development within the SOI area, and only residential uses are permitted on approximately 34 percent of the total SOI acreage under the current 2003 Brea General Plan. The remaining 4,050 acres (66 percent) are designated for open space, parks/recreation, and public facilities, with no residential or non-residential development potential.

Brea Core Specific Plan

The BCSP area generally refers to the area between Berry Street on the west, Lambert Road on the north, the SR-57 on the east plus Brea Plaza, and the properties abutting Imperial Highway (SR-90) on the south plus the triangle between the paper street of Randolph Avenue south of Imperial Highway (SR-90) and State College Boulevard. Refer to Figure 2-5, Existing Brea Core Specific Plan Area. The BCSP area generally refers to the area between Berry Street on the west, Lambert Road on the north, the SR-57 on the east plus Brea Plaza, and the properties abutting Imperial Highway (SR-90) on the south plus the triangle between the paper street of Randolph Avenue south of Imperial Highway (SR-90) and State College Boulevard as shown on Figure 2-5, Existing Brea Core Specific Plan Area. The BCSP area is developed with a variety of land uses including residential, commercial, office, industrial, institutional, mixed uses, and public land uses. Public and civic uses include the Brea Civic & Cultural Center, Brea Community Center, United States Post Office, Laurel Elementary School, Lagos De Moreno Park, and Brea Fire Station No. 2; commercial uses include the Brea Mall, Brea Gateway Center, Brea Village Center, Brea Marketplace, and Brea Plaza as well as smaller-scale commercial uses fronting Imperial Highway, Brea Boulevard and Berry Street; general industrial and light industrial uses are located in the northeastern and northern portions of the BCSP area; and the remaining significant portion of the BCSP area a variety of single-family and multi-family residential developments. Figure 2-6, Existing Zoning in the Brea Core Specific Plan Area, shows the current zoning within the BCSP area.

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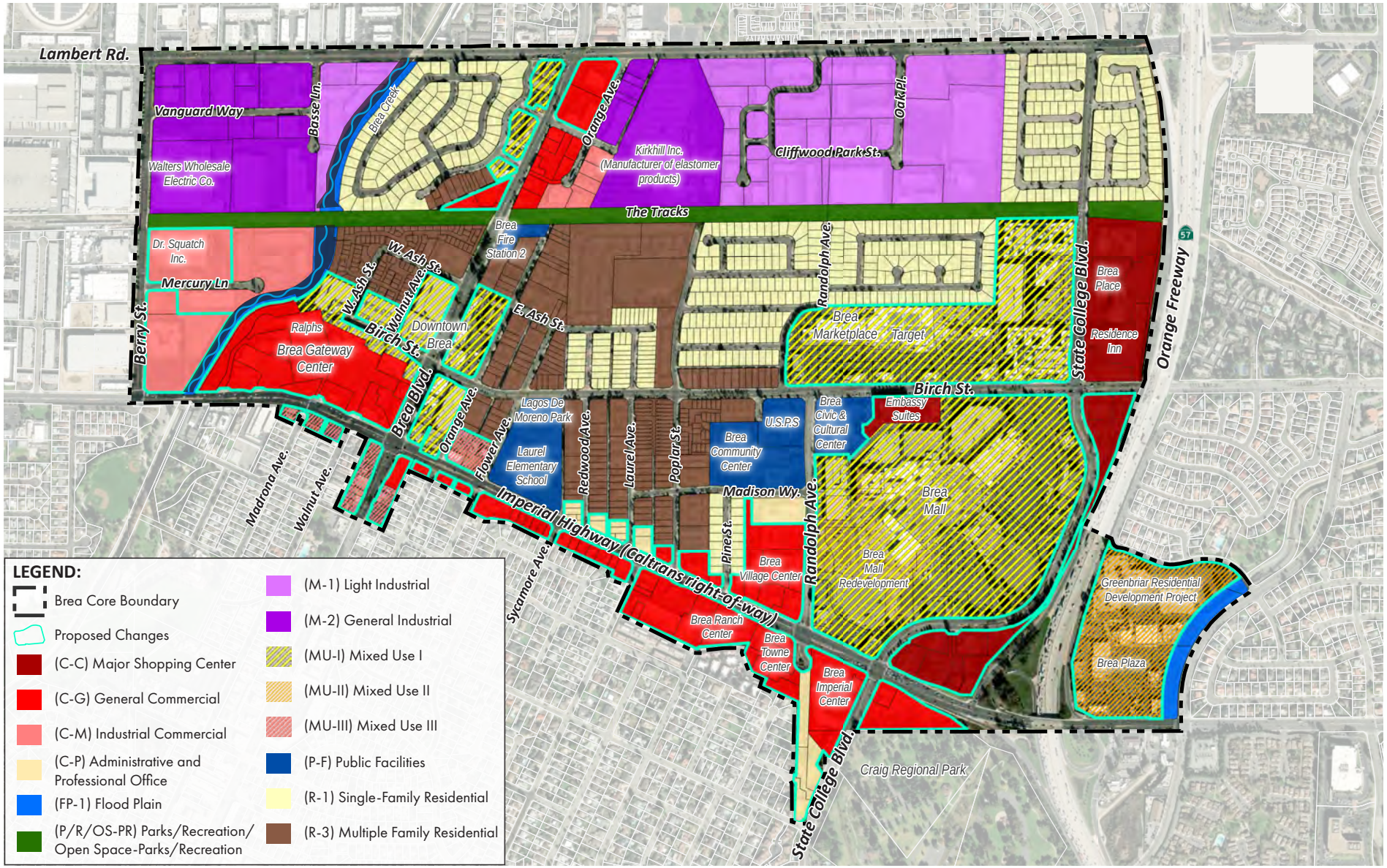
Source: De Novo Planning Group, 2025; City of Brea, 2025; Maxar Imagery, 2024.

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Figure 2-5

Existing Brea Core Specific Plan Area

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Source: De Novo Planning Group, 2026.

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Figure 2-6

Existing Zoning in the Brea Core Specific Plan Area

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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Surrounding Land Uses

The Project area is located in northeastern Orange County, bordered by a mix of incorporated cities and unincorporated county lands characterized by diverse residential, commercial, industrial, and open space uses. The City is part of the Northern Orange County subregion, within the Southern California Association of Governments planning area. It functions as a regional employment and commercial hub balanced by significant hillside and open space resources. Surrounding cities include the Cities of La Habra, Fullerton, Placentia, Yorba Linda, and Chino Hills. These surrounding cities and Brea collectively form a continuous urban corridor. SR-57, SR-90 (Imperial Highway), and SR-142 (Carbon Canyon Road/Valencia Avenue) and regional arterials such as Birch Street and Lambert Road provide local and regional connection to surrounding cities and land uses. General description of the area surrounding the incorporated City is provided below.

North: To the north, the City is bounded primarily by the unincorporated areas of Los Angeles County, including the Puente Hills and Chino Hills State Park. These areas are predominantly characterized by steep terrain and natural open space and habitat conservation areas.

South: The southern boundary of Brea adjoins the Cities of Fullerton, Placentia, and Yorba Linda, and portions of unincorporated Orange County. This area represents a more urbanized development, consisting primarily of established residential neighborhoods, commercial centers, and business parks, except for the unincorporated Orange County along the southeastern boundary and the Craig Regional Park that encompasses both the Cities of Brea and Fullerton southwest of SR-57 and Imperial Highway (SR-90).

East: To the east, Brea is bordered by unincorporated Orange County lands and the City of Chino Hills (San Bernardino County). This area includes a combination of natural open space, hillside residential neighborhoods, and recreational resources such as Chino Hills State Park, which extends into the Brea SOI. The eastern boundary follows natural ridgelines and canyon systems.

West: To the west, the City of Brea borders the Cities of La Habra and Fullerton in Orange County, and portions of Unincorporated Los Angeles County. This area is mostly residential neighborhood and commercial centers and light industrial uses along Harbor Boulevard.

2.2 Project Objectives

CEQA Guidelines, Section 15124(b), indicates that a statement of the objectives sought by the project shall be provided, which includes the underlying purpose of the project and project benefits. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the PEIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.

In accordance with Section 15124(b) of the CEQA Guidelines, the City of Brea identified the following objectives for the Proposed Project. These objectives were developed based on input collected through a robust public engagement process, which included open houses, online surveys, meetings with the General Plan Steering Committee, stakeholder interviews, and study sessions with the Planning Commission and City Council:

1. Preserve, protect, and enhance the City's small-town charm;
2. Continue to provide a community rich in amenities that meet the needs of current and future residents;
3. Accommodate a diverse range of housing development options and densities, ensuring that residents across income levels, age groups, and those with special needs can live within the community;
4. Advance economic development policies that support existing local businesses, attract new businesses, and promote job growth;
5. Encourage the long-term economic success of Downtown Brea and the community's corridors as mixed-use activity nodes;
6. Balance jobs and housing to create an economically sustainable community with reduced impacts on the City's transportation network;
7. Ensure new developments incorporate well-designed site planning, high-quality architecture, and functional outdoor spaces, while ensuring they are compatible with the surrounding setting in terms of land uses, scale, and aesthetics;
8. Preserve the natural environment, including open spaces, hillsides, and wildlife;
9. Maintain adequate, reliable, and essential public infrastructure and facilities, including transportation and utilities to support both existing and future development;
10. Maintain a Circulation Plan that fosters a safe and efficient roadway network by minimizing congestion and providing acceptable operation and level of service for vehicles at intersections and roadways;
11. Maintain and enhance the City's active transportation network to facilitate walking, bicycling, and public transit, improving multimodal connectivity throughout the City;
12. Provide for a wide range of housing opportunities in close proximity to existing and future employment centers and transportation facilities, consistent with the need identified in the City's 2021-2029 Housing Element and local and regional jobs/housing balance policies including Southern California Association of Government's Connect SoCal through regional programs such as the Sustainable Communities Program and related housing planning initiatives;
13. Support intensification and redevelopment within the Brea Core area through implementation and adoption of the Brea Core Specific Plan;

14. Provide a focused update to the 2003 Brea General Plan to comply with recent changes to State general plan and housing laws; and
15. Facilitate future use streamlining provisions allowed under the California Environmental Quality Act by providing updated community-level environmental review.

2.3 Project Background and Purpose

State law requires that every local jurisdiction adopt a comprehensive, long-term general plan, typically with a 20-year horizon. A general plan represents the community's view of its future and is often referred to as a blueprint for growth and development. State law requires that a general plan contain eight elements: land use, circulation, housing, open space, noise, safety, environmental justice, and conservation. General plans must be periodically updated to respond to new State laws, changing conditions, and emerging issues and opportunities. The purpose of the Proposed Project is to create a policy framework that articulates a vision for the City's long-term physical form and development while preserving and enhancing the quality of life for the City's residents.

In 2003, the City adopted the Brea General Plan (2003 Brea General Plan). The 2003 Brea General Plan comprises six chapters—Introduction, Community Development, Housing, Community Resources, Community Services, and Public Safety—that cover the required elements and additional topics of local relevance. Since 2003, the Housing chapter has been updated three times in compliance with California Housing Element law, with the most recent update adopted in August 2022 for the 6th Cycle Housing Element. No updates to the current Housing Element are expected to occur because of the Focused GPU or preparation of the BCSP. In addition, the Public Safety chapter was last amended in 2021 in conjunction with the 6th Cycle Housing Element, and the land use designation map has been periodically amended to accommodate specific projects. At the time of its preparation, the 2003 Brea General Plan was based on forecasting and projections with a horizon year of 2020. As such, it is no longer a visioning document for the community and is due for an update.

The City had planned to update the General Plan in 2020; however, this effort was delayed due to the world-wide COVID-19 pandemic.

2.3.1 Adopted 2003 Brea General Plan

The 2003 Brea General Plan identified the community's vision for its collective future and establishes the fundamental framework to guide future decision-making about development, resource management, public safety, public services, and general community well-being. The 2003 Brea General Plan serves as a policy guide, balancing these interrelated factors to Brea's community vision.

The 2003 Brea General Plan is comprised of five main chapters, excluding the Introduction chapter, that address general plan elements through various components: Community Development, Housing, Community Resources, Community Services, and Public Safety.

Chapter 2, Community Development, includes the following components:

- Land Use
- Circulation
- Infrastructure
- Urban Design
- Economic Development
- Growth Management

Chapter 3, Housing, is the 2021–2029 6th Cycle Housing Element, adopted on August 16, 2022. Since 2003, this chapter has been updated three times in compliance with the State Housing Element law, the 6th Cycle Housing Element is the latest update.

Chapter 4, Community Resources, includes the following components:

- Parks and Open Space
- Trails
- Wildlife Habitat
- Scenic Resources
- Water Conservation and Quality
- Air Quality
- Historic Resources

Chapter 5, Community Services, includes the following components:

- Human Services
- Recreation Program
- Educational Services
- Library Services
- Cultural Arts

Chapter 6, Public Safety, was last updated in 2021 in conjunction with the 6th cycle Housing Element, and includes the following components:

- Emergency Services
- Environmental Justice
- Climate Change
- Hazards Management
- Wildland Fires
- Flood Concerns
- Geologic and Seismic Considerations
- Noise

2.3.2 2017 Brea Envisions Community Strategic Plan

In 2017, the City of Brea adopted the 2017 Brea Envisions Community Strategic Plan (2017 Brea Envisions), establishing a long-term vision for community growth, quality of life, and sustainable development. It identifies core values, strategic goals, and initiatives to guide land use, transportation, housing, open space, public services, cultural amenities, and economic vitality. Developed through extensive community input, 2017 Brea Envisions reflects residents' priorities for what Brea should be now and in the future. Serving as a strategic overlay to the General Plan and related implementation tools, 2017 Brea Envisions provides policy direction for coordinated growth and investment.

2.3.3 2020 Brea Connecting the Core Active Transportation Plan

Following the adoption of 2017 Brea Envisions, the City began the effort to prepare a long-range plan for the heart of the City, coined the "Brea Core Plan" (Core Plan). As a first step, the 2020 Brea Connecting the Core Active Transportation Plan (2020 Brea Core ATP) was initiated to review the central core of the City, using Caltrans Sustainable Transportation Grant. Through this effort, the City looked at improving safety and access of major east–west corridors like Lambert Road and Imperial Highway and north–south corridors like Brea Boulevard and State College Boulevard. The grant helped fund community engagement efforts, collect data on existing conditions, develop plans for remedies to circulation and mobility challenges and to develop a plan for potential future improvements.

As a result, the 2020 Brea Core ATP was adopted in 2020, which identifies mobility challenges and recommends a toolbox of potential solutions to improve circulation within Brea's core. The community-driven 2020 Brea Core ATP developed a vision for a connected and safe transportation system for all, organized by three core elements, which are: (1) Provide access for people of all ages and abilities; (2) Focus on safety enhancements to the transportation network; and (3) Institute creative design solutions for places and streets.

2.3.4 General Plan Audit

In May 2023, the City conducted an audit of the 2003 General Plan. This audit comprehensively evaluated the topical content of each element, including existing goals, policies, and programs, for their currency and relevancy by examining the General Plan for its compliance with current State law and where it can be improved to incorporate new policies and programs that are in line with current best planning practice and examining each element for internal consistency with other elements. Ultimately, this audit identified the needed modifications and areas for improvement and provided a list of recommendations to be used in the next General Plan Update.

2.4 Project Components

The Proposed Project involves the adoption and implementation of the Focused GPU for the City and its SOI. The Focused GPU constitutes a comprehensive update to the City's existing 2003 Brea General Plan, ensuring its policies and programs align with current community needs, State mandates, and planning principles based on the General Plan Audit prepared in 2023. It comprehensively updates all chapters of the 2003 Brea General Plan, which are now formally designated as "Elements," instead of "Chapters." The comprehensive list of the updated goals, policies, and implementation actions is provided in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions. Figure 2-7, Proposed General Plan Land Use Designations, illustrates the proposed General Plan planning land uses. Table 2-2, Proposed Land Use Summary, includes the existing conditions and the proposed Focused GPU land use summary. As detailed in Table 2-2, the Focused GPU would allow for additional housing units and non-residential square footage across various land use categories within the incorporated City limits and SOI.

Table 2-2. Proposed Land Use Summary

GP Designation	Existing Conditions				Proposed General Plan Update				Proposed Change			
	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Cemetery	–	–	–	–	–	–	–	–	–	–	–	–
General Commercial	–	–	285,349	690	–	–	351,758	848	–	–	66,409	158
General Industrial[1]	–	–	4,489,591	10,855	–	–	5,178,449	12,478	–	–	688,858	1,623
High Density Residential	2,556	7,285	–	–	2,677	7,630	–	–	121	345	–	–
Hillside Residential	127	361	–	–	615	1,752	–	–	488	1,391	–	–
Light Commercial[1]	–	–	132,251	320	–	–	135,153	326	–	–	2,902	6
Light Industrial	–	–	7,477,742	18,080	–	–	10,481,374	25,256	–	–	3,003,632	7,176
Low Density Residential	6,668	19,005	–	–	6,775	19,310	–	–	107	305	–	–

Table 2-2. Proposed Land Use Summary

GP Designation	Existing Conditions				Proposed General Plan Update				Proposed Change			
	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Medium Density Residential[1]	1,545	4,403	–	–	1,575	4,489	–	–	30	86	–	–
Mixed Use 18[1]	130	369	160,691	389	256	730	197,495	476	126	361	36,804	87
Mixed Use 50	1,692	4,823	1,752,420	4,237	2,727	7,772	5,047,309	12,162	1,035	2,949	3,294,889	7,925
Open Space[1]	–	–	–	–	–	–	–	–	–	–	–	–
Parcelized ROW[1]	–	–	–	–	–	–	–	–	–	–	–	–
Parks/ Recreation	–	–	843,197	2,039		–	974,932	2,349	–	–	131,735	310
Public Facilities	–	–	33,598	81	–	–	76,502	184	–	–	42,904	103
Recreational Commercial	–	–	49,657	120	–	–	369,077	889	–	–	319,420	769
Specific Plan – Birch Hills[1]	475	1,353	572,055	1,383	475	1,353	572,055	1,383	0	0	0	0
Specific Plan – Brea 265[1]	–	–	–	–	1,100	3,134	17,424	42	1,100	3,134	17,424	42
Specific Plan – Brea Core (Proposed)	1,417	4,040	5,113,863	12,365	4,752	13,542	6,379,588	15,373	3,335	9,502	1,265,725	3,008
Specific Plan – Brea Industrial[1,2]	–	–	570,000	1,378	–	–	806,078	1,942	–	–	236,078	564
Specific Plan – Olinda Ranch[1]	622	1,773	–	–	622	1,773	–	–	0	0	–	–
Specific Plan – Tomlinson Park[1]	321	915	–	–	321	915	–	–	0	0	–	–
Specific Plan – Tonner Hills[1]	793	2,259	–	–	793	2,259	–	–	0	0	–	–
City Limit Total	16,345	46,585	21,480,414	51,937	22,688	64,660	30,587,193	73,709	6,343	18,075	9,106,779	21,772
Hillside Residential[1]	–	–	–	–	1,048	2,987	–	–	1,048	2,987	–	–
Open Space[1]	–	–	–	–	–	–	–	–	–	–	–	–
Parks/ Recreation[1]	–	–	–	–	–	–	–	–	–	–	–	–
Public Facilities[1]	–	–	–	–	–	–	–	–	–	–	–	–
SOI Total	–	–	–	–	1,048	2,987	–	–	1,048	2,987	–	–
Grand Total	16,345	46,585	21,480,414	51,937	23,736	67,647	30,587,193	73,709	7,391	21,062	9,106,779	21,772

Notes: NRSF = non-residential square feet; Pop = population; ROW = right-of-way; SOI = Sphere of Influence

[1] These uses are consistent with the 2003 Brea General Plan, and no additional land uses beyond those identified in the 2003 Brea General Plan are proposed under the Focused General Plan Update.

[2] Additional development potential exists within the Brea Industrial Specific Plan area under the existing/adopted Specific Plan; this development potential (beyond existing conditions) is reflected accordingly in the Proposed General Plan Update development potential totals.

One area of substantial change is proposed for the Mixed Use 50 land use category, which would allow an additional 1,035 residential units and approximately 3.3 million square feet of non-residential uses. An additional approximately 3 million square feet of non-residential uses would also be allowed under the Light Industrial use category. Within the new BCSP area, a total of 4,752 residential units and approximately 6.38 million square feet of non-residential uses would be allowed, representing an increase of 3,335 residential units and approximately 1.26 million square feet of non-residential development compared to existing conditions.

Additionally, no changes to the development potential of existing specific plans are proposed as part of the Proposed Project. Although Table 2-2 identifies a limited number of housing units within the unincorporated SOI under the Hillside Residential General Plan land use designation, these units are consistent with the 2003 Brea General Plan, and no additional increase is proposed under the Focused GPU. Similarly, although increases in land use summary totals are shown for the Brea 265 Specific Plan, Brea Industrial Specific Plan, and the Light Industrial General Plan land use category, these are consistent with the adopted 2003 Brea General Plan, and no additional development potential is proposed under the Focused GPU.

For CEQA purposes, the baseline for impact evaluation is the existing on the ground conditions as compared to buildout of the City in accordance with the Proposed General Plan, as identified above in Table 2-2. However, Table 2-3, 2003 Brea General Plan and Proposed Land Use Change Summary, provides a plan-to-plan comparison for informational purposes only to accurately depict the changes that would be implemented by the Focused GPU.

Table 2-3. 2003 Brea General Plan and Proposed Land Use Change Summary

GP Designation	2003 Brea General Plan				Proposed General Plan Update				Plan-to-Plan Change			
	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Cemetery	–	–	–	–	–	–	–	–	–	–	–	–
General Commercial	–	–	362,776	874	–	–	351,758	848	–	–	(11,018)	(26)
General Industrial	–	–	5,178,449	12,478	–	–	5,178,449	12,478	–	–	0	0
High Density Residential	2,592	7,388	101,393	244	2,677	7,630	–	–	85	242	(101,393)	(244)
Hillside Residential	615	1,752	–	770	615	1,752	–	–	0	0	–	(770)
Light Commercial	–	–	135,153	326	–	–	135,153	326	–	–	0	0
Light Industrial	–	–	10,481,374	27,073	–	–	10,481,374	25,256	–	–	0	(1,817)
Low Density Residential	6,702	19,100	6,819	16	6,775	19,310	–	–	73	210	(6,819)	(16)

Table 2-3. 2003 Brea General Plan and Proposed Land Use Change Summary

GP Designation	2003 Brea General Plan				Proposed General Plan Update				Plan-to-Plan Change			
	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs	Units	Pop.	NRSF	Jobs
Medium Density Residential	1,575	4,489	–	–	1,575	4,489	–	–	0	0	–	–
Mixed Use 18	256	730	197,495	476	256	730	197,495	476	0	0	0	0
Mixed Use 50	1,724	4,913	2,680,921	4,643	2,727	7,772	5,047,309	12,162	1,003	2,859	2,366,388	7,519
Open Space	–	–	–	–	–	–	–	–	–	–	–	–
Parcelized ROW	–	–	–	–	–	–	–	–	–	–	–	–
Parks/ Recreation	24	69	1,403,516	3,382	0	0	974,932	2,349	(24)	(69)	(428,584)	(1,033)
Public Facilities	27	78	76,737	185	–	–	76,502	184	(27)	(78)	(235)	(1)
Recreational Commercial	–	–	369,077	120	–	–	369,077	889	–	–	0	769
Specific Plan – Birch Hills	475	1,353	572,055	1,383	475	1,353	572,055	1,383	0	0	0	0
Specific Plan – Brea 265	1,100	3,134	17,424	42	1,100	3,134	17,424	42	0	0	0	0
Specific Plan – Brea Core Study Area (Proposed)	2,461	7,013	6,087,642	14,669	4,752	13,542	6,379,588	15,373	2,291	6,529	291,946	704
Specific Plan – Brea Industrial[1]	–	–	806,078	1,942	–	–	806,078	1,942	–	–	0	0
Specific Plan – Olinda Ranch	622	1,773	–	–	622	1,773	–	–	0	0	–	–
Specific Plan – Tomlinson Park	321	915	–	–	321	915	–	–	0	0	–	–
Specific Plan – Tonner Hills	793	2,259	–	–	793	2,259	–	–	0	0	–	–
City Limit Total	19,287	54,967	28,476,908	68,624	22,688	64,660	30,587,193	73,709	3,401	9,693	2,110,285	5,085
Hillside Residential	1,048	2,987	–	–	1,048	2,987	–	–	0	0	–	–
Open Space	–	–	–	–	–	–	–	–	–	–	–	–
Parks/ Recreation	–	–	–	–	–	–	–	–	–	–	–	–
Public Facilities	–	–	–	–	–	–	–	–	–	–	–	–
SOI Total	1,048	2,987	–	–	1,048	2,987	–	–	–	–	–	–
Grand Total	20,335	57,954	28,476,908	68,624	23,736	67,647	30,587,193	73,709	3,401	9,693	2,110,285	5,085

2.4.1 Focused General Plan Update

The Focused GPU includes comprehensive updates to the Community Development, Community Resources (merged with Community Services element), and Public Safety Elements, and introduces two new Elements—Mobility and Economic Development—resulting in a total of five updated General Plan Elements as summarized below.

2.4.1.1 Community Development Element

The Community Development Element serves as a comprehensive blueprint for the physical development of Brea and addresses the building blocks of the community—the land use patterns and intensities, backbone infrastructure, and the visual character of public places and private development. The Community Development Element has been comprehensively updated to address the topics of land use planning, community design and placemaking, neighborhood preservation, hillside development infrastructure, and growth management. The topics of economic development and circulation, which were previously discussed in the 2003 General Plan, are no longer included in the Community Development Element and are instead addressed in the new Economic Development Element and Mobility Element, respectively.

2.4.1.2 Community Resources Element

The Community Resources Element recognizes Brea's strong sense of community rooted in its commitment to providing exceptional amenities and inclusive services. The City's parks, sports facilities, trails, open spaces, and cultural facilities offer places for residents and visitors to gather, play, and enjoy their lives. These resources, coupled with the City's robust community services, foster connections among neighbors and create a welcoming environment where residents of all ages and backgrounds can thrive. The Community Resources Element has been comprehensively updated to address the topics of parks and trails, human services, open space, scenic vistas, biological resources, artistic, cultural and historical resources, and education services. The Community Resources Element has been merged with the Community Services Element of the 2003 Brea General Plan, and includes topics previously addressed in the Community Services Element.

2.4.1.3 Public Safety Element

The Public Safety Element addresses natural and human-caused hazards in Brea and the potential short and long-term risks to human life, property, and the economic and social disruption resulting from wildfires, earthquakes, landslides, floods, noise exposure, and other hazards. The Public Safety Element works in conjunction with the Brea Local Hazard Mitigation Plan and Emergency Operations Plan, which cover many similar topics including natural hazards and evacuation planning. The Public Safety Element has been comprehensively updated to address the topics of wildland fire, geologic and seismic hazards, flood hazards (including dam failure), hazardous materials, climate change and resiliency planning, emergency preparedness and response, and noise.

2.4.1.4 Mobility Element

The Mobility Element (also referred to as the Circulation Element), supports the provision of a safe, efficient, and adequate multimodal circulation system. This is a new Element and addresses the topics of regional circulation, local circulation, complete streets, pedestrian and bicycle facilities, and public transportation.

2.4.1.5 Economic Development Element

The Economic Development Element guides the City's future policy decisions in service of supporting and strengthening the local economy. Although not required by law to be included in the General Plan, the Economic Development Element is included to recognize and promote economic vibrancy and resiliency as a central aspect of planning for Brea's future. This is a new Element and addresses the topics of a diverse and resilient economy, a business-friendly environment, and workforce attraction and retention.

All five elements of the Focused GPU are generally organized to include introduction, existing conditions, and goals sections, with each goal supported by relevant policies and actions. The Focused GPU goals, policies, and actions are included in Appendix C to this PEIR.

2.4.2 Brea Core Specific Plan

The new BCSP encompasses approximately 778.97 acres and has been prepared to implement the values identified in the 2017 Brea Envisions and the goals, policies, and recommendations of the 2020 Brea Core ATP. The BCSP establishes land uses, as shown on Figure 2-8, Proposed Brea Core Specific Plan Area Zoning; provides mobility recommendations and streetscape improvements; proposes infrastructure upgrades to support new development; and outlines implementation strategies. This area is identified as the Specific Plan – Brea Core Study Area on Figure 2-7, which depicts the proposed Focused GPU land uses, and on Figure 2-8, which illustrates the proposed zoning for the BCSP area.

The BCSP would allow for the development of 4,752 residential units and approximately 6,379,588 square feet of non-residential uses within the plan area, representing an increase of 3,335 residential units and approximately 1,265,725 square feet of non-residential uses compared to existing conditions.

The BCSP emphasizes mixed-use and pedestrian-oriented development with the inclusion of the Mixed Use 18 and Mixed Use 50 land use designations, which allow for both vertical and horizontal mixing of compatible residential and nonresidential uses and connecting uses through appropriate pedestrian linkages, parking, and public open space (e.g., linkage parks or small plazas). Additionally, the BCSP provides further connectivity through additional bicycle connections and wayfinding within the BCSP area, while providing beautification

recommendations through streetscape improvements such as additional lighting, benches, and landscaping. The BCSP is organized as summarized below:

Introduction and Purpose: Provides an overview, purpose, and context for the BCSP, defines the area affected, summarizes community engagement, and describes the relationship to other pertinent City documents and policies.

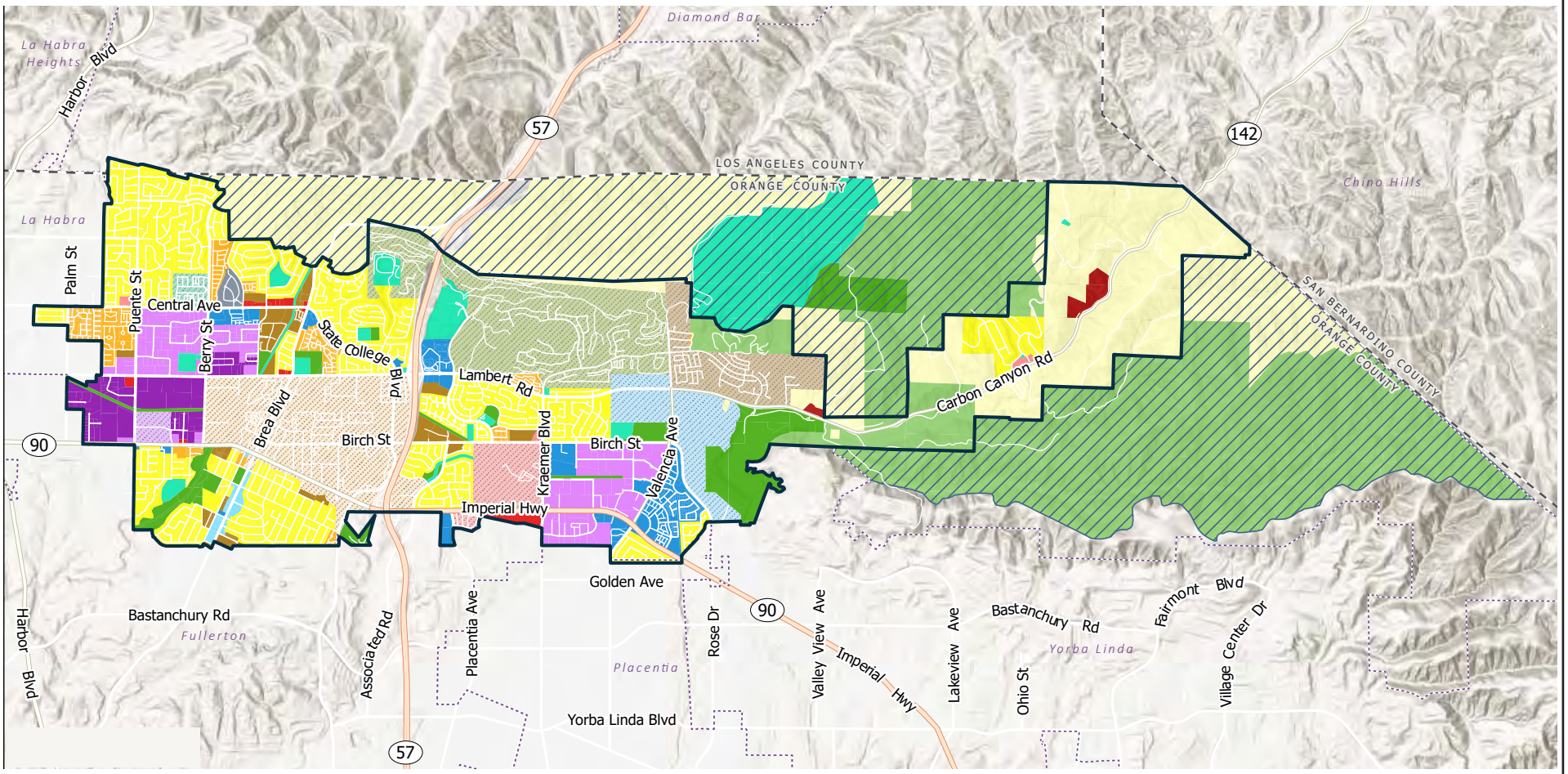
Land Use: Establishes land uses for the BCSP. Mixed Use 18 absorbs the former Mixed Use II designation, and allow mixed use up to 18 dwelling units per acre. Mixed Use 50 would allow up to 50 dwelling units per acre, which is the result of consolidating Mixed Use I and Mixed use II. The new Mixed Use 18 and Mixed Use 50 zones will establish allowable land uses, building form, and site development standards, such as height, setbacks, parking, and objective design standards, as part of the Brea City Code.

Mobility and Beautification: Provides a snapshot of existing conditions and mobility recommendations to networks for pedestrians, bicyclists, automobiles, and transit. Discusses possible streetscape improvements such as streetscape furnishings, gateways, and signage.

Infrastructure and Public Services: Describes existing conditions and proposed improvements to infrastructure (potable water system, sanitary sewer system, storm drainage system, dry utilities) and public services (police protection and emergency services, fire protection, schools, libraries, parks and recreation, and solid waste management).

Implementation: Provides strategies and an action plan with priorities, programs, and responsible parties to implement the concepts described within the BCSP.

Administration: Establishes the authority of the BCSP, processing requirements, and the procedures required for amendments to the BCSP.



LEGEND

- Brea City Boundary
- Brea Sphere of Influence
- County Boundary
- Other Incorporated Area

Residential
- Hillside Residential
- Low Density Residential
- Medium Density Residential
- High Density Residential

Mixed Use
- Mixed Use 18
- Mixed Use 50

Commercial
- General Commercial
- Light Commercial
- Recreational Commercial

Industrial
- Light Industrial
- General Industrial

Public Areas
- Parks/Recreation
- Open Space
- Public Facilities
- Cemetery

Specific Plan
- Specific Plan - Birch Hills
- Specific Plan - Brea 265
- Specific Plan - Brea Core
- Specific Plan - Brea Industrial
- Specific Plan - Olinda Ranch
- Specific Plan - Tomlinson Park
- Specific Plan - Tonner Hills

Source: De Novo Planning Group, 2026.

Harris & Associates

N

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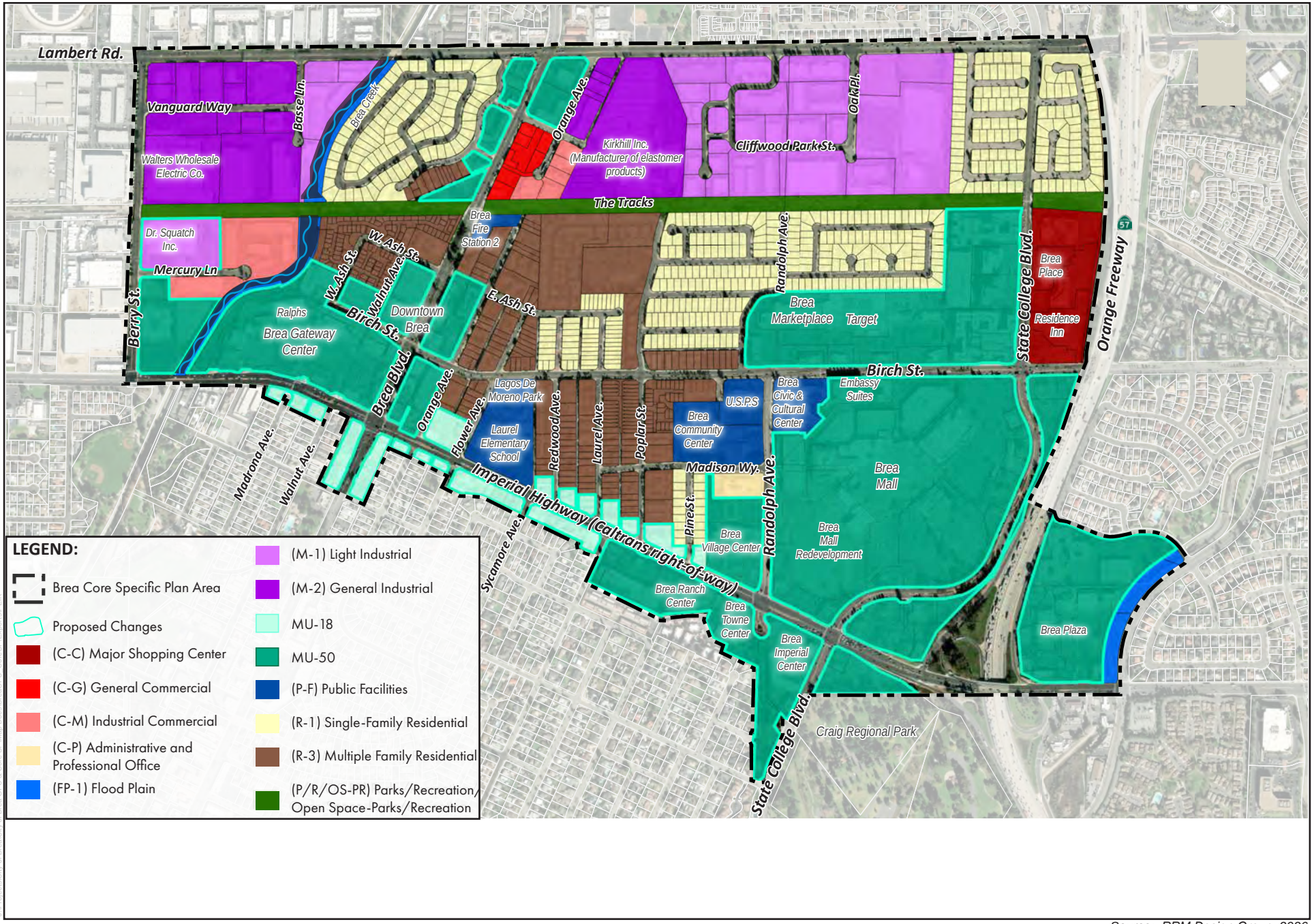
Miles

Figure 2-7

Proposed General Plan Land Use Designations

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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Source: RRM Design Group, 2026.

Harris & Associates

N

0 500 1,000

Feet

Figure 2-8

Proposed Brea Core Specific Plan Area Zoning

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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2.5 Intended Uses of the PEIR

CEQA Guidelines, Section 15168(c), states that subsequent activities in a program must be examined in light of the PEIR to determine if an additional environmental document must be prepared. This PEIR assumes that future development consistent with the Proposed Project could be subject to further environmental review at the time specific projects are proposed. The analysis of future actions would be based on existing conditions at the site and vicinity at such times an action is proposed and would consider any updated information relevant to the environmental analysis of the future projects (e.g., changes to the environmental setting).

Consistent with CEQA Guidelines, Section 15168, this PEIR will facilitate streamlined CEQA review for future actions and development projects that implement, or are consistent with, the Proposed Project in accordance with the applicable provisions of CEQA and the CEQA Guidelines.

2.5.1 Tiering Opportunities

California Public Resources Code (PRC), Section 210685, states the following:

> Tiering“ or “tier” means the coverage of general matters and environmental effects in an environmental impact report prepared for a policy, plan, program or ordinance followed by narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report.

This PEIR is intended for all other types of projects proposed to be carried out or approved by a lead agency within the region to tier from, as appropriate, pursuant to CEQA Guidelines, Sections 15152 and 15385, and California PRC Sections 21068.5 and 21093–21094. Once certified by the City Council, a later tiered EIR from this PEIR would not be required to examine effects that (1) were mitigated or avoided in this PEIR, and (2) were examined at a sufficient level of detail in this PEIR to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project (California PRC Section 21094).

2.5.2 CEQA Guidelines, Section 15183, Streamlined Review

Pursuant to California PRC Section 21166 and provisions of the CEQA Guidelines, including Section 15183, this PEIR would provide for streamlined review of certain projects that are consistent with the development density established by General Plan policies for which an EIR was certified and eligible infill projects. In accordance with these requirements, this PEIR will support streamlined environmental review for future activities that are consistent with and that would implement the goals and policies of the Proposed Project following their adoption.

CEQA Guidelines, Section 15183, states that:

> CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified require no additional CEQA review, except as might be necessary to examine if there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

Applicants would be responsible for implementing applicable mitigation measures, relevant municipal codes and development standards, and existing regulatory requirements as outlined in this PEIR to streamline using CEQA Guidelines 15183. If future projects implementing the Focused GPU and BCSP require the incorporation of mitigation measures from this PEIR, the City is required to make a finding at a public hearing regarding if the feasible mitigation measures will be implemented, pursuant to CEQA Guidelines, Section 15183(e)(2).

CEQA Guidelines, Section 15183.3, provides streamlined environmental review for eligible infill projects that meet certain criteria, as established by SB 226 (2011). This section reduces the burden of preparing full EIRs for qualifying infill residential, commercial, or mixed-use projects by limiting the topics subject to review at the project-level where the effects of infill development have been previously addressed in a planning-level decision or by uniformly applicable development policies.

2.6 Discretionary Actions

- Adoption of the Brea 2050: Focused General Plan Update;
- Adoption of the Brea Core Specific Plan;
- Certification of PEIR;
- Adoption of Findings of Fact and Statement of Overriding Considerations (if required);
- Adoption of the Mitigation Monitoring Program; and
- Adoption of any ordinances, guidelines, programs, actions, or other mechanisms that implement the Brea Focused General Plan Update and the Brea Core Specific Plan.

2.6.1 Other Agency Approvals

Under CEQA, State and local agencies other than the lead agency that have discretionary authority over a project or aspects of a project are considered responsible agencies. No responsible agencies have been identified for the Proposed Project.

Chapter 3 Environmental Setting

This chapter provides a "description of the physical environmental conditions in the vicinity of the project" (CEQA Guidelines, Section 15125[a]), pursuant to provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from "Brea 2050: Focused General Plan Update (Focused GPU) and Brea Core Specific Plan (BCSP)" (together referred to as the Proposed Project or Project).

3.1 Regional Environmental Setting

3.1.1 Regional Location

The Proposed Project encompasses the City of Brea (City) and its Sphere of Influence (SOI). The City's incorporated boundaries and the SOI together compose the Focused GPU planning area (referred to as the Proposed Project area or Project area). Figure 2-1, Regional Location, shows the Proposed Project area in a regional context, and Figure 2-2, City of Brea and Sphere of Influence (SOI), illustrates the Project area boundaries, including the BCSP area. The City is in the northeastern corner of Orange County, where the boundaries of Orange, Los Angeles, and San Bernardino Counties converge. The Project area is bordered by unincorporated Orange County land and the Los Angeles County line to the north; Chino Hills State Park and the San Bernardino County line to the east; the Cities of Yorba Linda, Placentia, and Fullerton to the south; and the City of La Habra to the west. The Orange Freeway (State Route [SR-] 57) and Valencia Avenue (SR-142) (from Carbon Canyon Road to Imperial Highway) bisect the City from north to south.

3.1.2 Regional Planning Considerations

3.1.2.1 SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is a council of governments representing six counties—Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties—191 cities, and more than 19 million residents. SCAG is the nation's largest metropolitan planning organization, with jurisdiction over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs.

The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), "Connect SoCal," was adopted in April 2024. Connect SoCal embodies a collective vision for the

region's future and was developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the member counties. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. It builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for residents of Southern California. To achieve the plan's vision, elements are organized within the pillars of Mobility, Communities, Environment and Economy. Connect SoCal allocates $751 billion for transportation projects, including over 2,000 transportation projects through 2050, such as highway and street improvements, bicycle and pedestrian pathways, railroad grade separations, new transit hubs, and replacement bridges. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas (GHG) emission reduction goals and federal Clean Air Act requirements. Connect SoCal also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, improvement of access to jobs and educational resources, support for the region's vital goods movement industries, and more efficient use of resources.

The SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). The SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets identified by the California Air Resources Board. However, the SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

3.1.2.2 South Coast Air Basin Air Quality Management Plan

The Proposed Project area is in the South Coast Air Basin, which is managed by the South Coast Air Quality Management District. Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law and standards are detailed in the South Coast Air Basin Air Quality Management Plan. Air pollutants for which ambient air quality standards (AAQS) have been developed are known as criteria air pollutants—ozone (O_3), carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NOx), sulfur dioxide, coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead. VOC and NOx are criteria pollutant precursors and go on to form secondary criteria pollutants, such as O_3, through chemical and photochemical reactions in the atmosphere. Air basins are classified as attainment/nonattainment areas for particular pollutants depending on whether they meet AAQS

for that pollutant. The South Coast Air Basin is designated nonattainment for O_3, $PM_{2.5}$, PM_{10}, and lead (Los Angeles County only) under the California and National AAQS and nonattainment for NO_2 under the California AAQS.

3.1.2.3 2022 Scoping Plan for Achieving Carbon Neutrality

Assembly Bill (AB) 32 requires California Air Resources Board (CARB) to reduce Statewide GHG emissions to 1990 levels by 2020. As part of this legislation, CARB was required to prepare a "Scoping Plan" that demonstrates how the State will achieve this goal. The first Scoping Plan was adopted in 2011 and describes local governments as "essential partners" in meeting the Statewide goal, recommending a GHG emission reduction level 15 percent below 2005–2008 levels (depending on when a full emissions inventory is available) by 2020.

As directed by AB 32, CARB adopted the first Climate Change Scoping Plan (Scoping Plan) in December 2008, in accordance with California Health and Safety Code, Section 38561. The Scoping Plan included measures to address GHG emissions reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The Scoping Plan was updated in 2014, 2017, and most recently in 2022.

The most recent update to the Scoping Plan was adopted by CARB in December 2022 (2022 Scoping Plan). The 2022 Scoping Plan assesses progress toward the statutory 2030 target of at least 40 percent below 1990 emissions and identifies a path to achieving carbon neutrality by 2045, consistent with AB 1279 targets described above. The 2022 Scoping Plan identifies reductions for each GHG emission sector (e.g., the transportation, industry, electricity generation, agriculture, commercial and residential, and waste sectors) to achieve these goals. For each of these sectors, the 2022 Scoping Plan also describes strategies for GHG emissions reductions (CARB 2022).

3.1.2.4 Master Plan of Arterial Highway

The Orange County Transportation Authority administers the Master Plan of Arterial Highways (MPAH), including the review and approval of amendments requested by local agencies. The MPAH is a countywide Transportation Plan for Orange County, designed to manage and improve the arterial highway network. Established in 1956, the MPAH was created to complement the county's developing freeway system and has evolved into a critical element of Orange County's long-range transportation policy.

Over the years, the MPAH has played a crucial role in shaping the county's transportation infrastructure, ensuring a coordinated effort between the Orange County Transportation Authority and the cities within Orange County. The primary goal of the MPAH is to outline a regional arterial highway system that supports existing and future land uses, ensuring that roads are designed to accommodate projected traffic volumes. It aims to provide a circulation system that complements the county's freeway network, focusing on the efficient movement of people and goods (OCTA 2025).

3.1.2.5 Orange County Congestion Management Program

California law (Proposition 111) requires each county to adopt a Congestion Management Program that outlines how vehicular congestion issues will be addressed over a seven-year period. The Orange County Congestion Management Program was adopted by the Orange County Transportation Authority in July 1991 and is reviewed every two years.

3.1.2.6 Orange County General Plan

Approximately 6,232.9 acres of the Project area are located within unincorporated Orange County and outside the City's incorporated limits. Land use and development within these areas are regulated by the Orange County General Plan, which establishes policies for land use, resource management, circulation, and public services under Orange County's jurisdiction. Inclusion of Orange County's planning framework also supports analysis of potential land use compatibility issues, regional coordination, and future annexation considerations within the City's SOI.

3.2 Local Environmental Setting

3.2.1 Project Location

3.2.1.1 Focused General Plan Update

The Focused GPU area encompasses the City and its SOI. The Orange Freeway (SR-57) and Valencia Avenue (SR-142) (from Carbon Canyon Road to Imperial Highway) bisect the City from north to south. The three major east–west roadways are Imperial Highway (SR-90), Carbon Canyon Road (SR-142), and Lambert Road. The entire Project area encompasses 14,481.9 acres, with 8,249 acres within the incorporated limits of the City and 6,232.9 acres within the SOI. Refer to Figure 2-2, City of Brea and Sphere of Influence, in Chapter 2, Project Description, of this PEIR.

3.2.1.2 Brea Core Specific Plan

The BCSP area is generally bounded by Lambert Road to the north, Imperial Highway (SR-90) to the south, Berry Street to the west, and SR-57 and Associated Road to the east. The BCSP area totals approximately 778.97 acres. Refer to Figure 2-5, Existing Brea Core Specific Plan Area, in Chapter 2, Project Description, of this PEIR.

3.2.2 Existing Conditions

Refer to the Existing Conditions sections in Sections 4.1 (Aesthetics) through 4.16 (Wildfire) for existing conditions pertaining to each environmental issue area.

3.2.3 Current Zoning

The Brea Zoning Code—Title 20 of the Brea City Code—establishes the zoning districts for each parcel throughout the City. The Zoning Code is intended to guide the development of the City in

an orderly manner, implement the policies of the General Plan to encourage the most appropriate use of land; to conserve and stabilize the value of property; to provide adequate open spaces for light and air, and to prevent and permit adequate control of fires; to prevent undue concentration of population; to lessen congestion on streets; to facilitate adequate provision for community facilities and utilities, including transportation, water supply, sewage disposal, schools, parks and other public requirements which tend to promote the health, safety and public welfare; all in accordance with a comprehensive plan for the orderly development of the City and its environs.

3.2.4 Public Services and Utilities

Public Services and utilities in the Project area are listed below:

- Police – Brea Police Department within the incorporated City of Brea and Orange County Sheriff's Department for the SOI area
- Fire – Brea Fire Department and Orange County Fire Authority
- Public Schools – Brea Olinda Unified School District, La Habra City School District, Fullerton Joint Union High School District, and Placentia-Yorba Linda Unified School District
- Library – Brea Branch of the Orange County Public Library
- Water and Wastewater Systems – City of Brea
- Wastewater Treatment – Orange County Sanitation District
- Drainage System – City of Brea
- Solid Waste Collection – Republic Services
- Electricity – Southern California Edison
- Natural Gas – Southern California Gas

3.3 Assumptions Regarding Cumulative Impacts

CEQA Guidelines, Section 15130, requires discussion of cumulative impacts where they are significant and specifies that such discussion should reflect the severity of the impact and the likelihood of its occurrence, though not at the same level of detail as required for an individual project. Section 15355 defines a cumulative impact as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Accordingly, cumulative impacts represent the incremental effect of a project when added to other past, present, and reasonably foreseeable future projects.

If a project's incremental contribution to a cumulative impact is not cumulatively considerable, the lead agency is not required to identify the impact as significant but must briefly explain the basis for that conclusion. Consistent with these requirements, this PEIR evaluates potential cumulative impacts in Chapter 4, Environmental Analysis, for each applicable environmental issue area at a level of detail commensurate with the severity and likelihood of each impact.

The geographic scope of cumulative impacts varies by resource topic. As a programmatic EIR encompassing the City and its SOI, cumulative development is assumed to occur both within and outside the Project area, as appropriate to the impact being evaluated.

The CEQA Guidelines (Section 15130 [b][1]) state that the information utilized in an analysis of cumulative impacts should come from one of two sources:

A. A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or
B. A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions.

This PEIR primarily uses Method B (CEQA Guidelines, Section 15130[b][1][B]). Consistent with Section 15130(b)(1)(B) of the CEQA Guidelines, this PEIR analyzes the environmental impacts of development in accordance with the City's proposed Focused GPU and the BCSP (i.e., the Proposed Project). As a result, this PEIR addresses the cumulative impacts of development within the City and the larger Orange County region surrounding it, as appropriate. For most resource areas, cumulative impacts are assumed to be largely confined to the City boundary, as the City provides municipal services and utilities. However, for environmental topics with a broader geographic context—such as traffic, air quality, noise, and GHG emissions—which have the potential to impact beyond the City boundary—the analysis relies on a regional traffic model (Orange County Transportation Model) that the City uses to forecast cumulative growth in the City and region. The Orange County Transportation Model uses land use, socioeconomic, and network data to estimate travel patterns, roadway traffic volumes, and performance measures. Cumulative air quality impacts also use adopted regional planning documents such as SCAG's 2024–2050 Connect SoCal, as well as the South Coast Air Quality Management District's 2022 Air Quality Management Plan for operational air quality and Air Quality Management Plan consistency analyses. Growth projections adopted by the City and the surrounding region form the basis for the cumulative impact analyses presented in this PEIR. Further discussion of cumulative impacts related to development and growth is provided in Chapter 4.

Chapter 4 Environmental Analysis

Sections 4.1 through 4.16 in this chapter contain a discussion of the potential environmental effects from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project), including the current environmental setting; thresholds of significance; plans, programs, and policies; environmental impacts; cumulative impacts; level of significance before mitigation; mitigation measures, and level of significance after mitigation.

Scope of the Environmental Impacts Analysis

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

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils (paleontological resources only)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The following environmental impact categories were determined not to result in significant impacts; therefore, they are discussed in Chapter 5, Effects Found Not to Be Significant.

- Agriculture and Forestry Resources
- Geology and Soils (excluding paleontological resources)
- Mineral Resources
- Population and Housing
- Recreation

Format of the Environmental Impact Analysis

The following sections compose each of the 16 environmental issue area sections in Sections 4.1 through 4.16 of this Program Environmental Impact Report (PEIR). The sections will discuss both the Focused GPU and the BSCP, together or separately, depending on environmental issue area.

Environmental Setting

This section describes the current environmental setting of each environmental issue area. According to Section 15125 of the CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the project vicinity to provide the "baseline conditions" against which project-related impacts are compared. Normally, the baseline conditions are the physical conditions that exist when the Notice of Preparation (NOP) is published. The NOP for the Proposed Project was published on August 25, 2025, and the baseline conditions in this Draft PEIR are generally taken from this time period. However, the CEQA Guidelines and applicable case law recognize that the date for establishing an environmental baseline cannot always be rigid. Physical environmental conditions may vary over a range of time periods; thus, the use of environmental baselines that differ from the publication date of the NOP is reasonable and appropriate when conducting the environmental analyses.

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

Thresholds of Significance

This section identifies the criteria used to determine whether potential environmental effects are significant. The thresholds of significance used in this analysis were primarily based on Appendix G of the CEQA Guidelines. This section defines the type, amount, and/or extent of impact that would be considered a significant, adverse change in the environment. Some thresholds of significance are quantitative, while others are qualitative. The thresholds of significance are intended to assist the reader in understanding how and why this Draft PEIR reaches a conclusion that an impact is significant, potentially significant, or less than significant.

Plans, Programs, and Policies

This section identifies existing regulatory requirements required by the approving agency based on the type of review or action proposed. It provides applicable plans, programs, and policies (PPPs) relevant to the Proposed Project that would help reduce or avoid potential impacts that are not considered mitigation measures. Because these measures are standard requirements, they are not considered mitigation measures.

Environmental Impacts

This section describes the potential environmental impacts of the Proposed Project and, based on the thresholds of significance, concludes if the environmental impacts would be significant, potentially significant, or less than significant, or if no impact would occur. Each impact criterion is addressed in its own section. This format is designed to assist the reader in quickly identifying the subject of each impact analysis and for use in Table ES-2, Summary of Environmental Impacts and Mitigation Measures, which forms the basis of the Mitigation Monitoring and Reporting Program.

The analysis of environmental impacts considers both the construction and operational phases associated with implementation of the Proposed Project. As required by Section 15126.2(a) of the CEQA Guidelines, direct, indirect, long-term, short-term, on-site, and/or off-site impacts are addressed, as appropriate, for the environmental issue area being analyzed. This Draft PEIR uses the following terms to describe the level of significance of impacts identified during the course of the environmental analysis:

- **No Impact:** "No impact" refers to implementation of the Proposed Project having no impact on environmental conditions.
- **Less than Significant Impact:** "Less than significant" refers to two conditions:
  - Impacts resulting from implementation of the Proposed Project that are not likely to exceed the defined standards of significance.
  - Potentially significant impacts before implementation of mitigation measures. If implementation of the specified mitigation measures would reduce the potentially significant impact to a level that does not exceed the defined standards of significance, the impact is considered less than significant.
- **Potentially Significant Impact:** "Potentially significant" refers to impacts resulting from implementation of the Proposed Project that may exceed defined standards of significance before mitigation is considered.
- **Significant and Unavoidable Impact:** "Significant and unavoidable" refers to impacts resulting from implementation of the Proposed Project that cannot be eliminated or reduced to below the defined standards of significance or a less than significant level through implementation of feasible mitigation measures.

A "significant effect" is defined by Section 15382 of the CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment . . . [but] may be considered in determining whether the physical change is significant."

Cumulative Impacts

CEQA requires that EIRs discuss cumulative impacts in addition to project impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the Proposed Project alone. Further, the discussion should be guided by the standards of practicality and reasonableness (CEQA Guidelines, Section 15130[b]). Please refer to Section 3.3 of this Draft PEIR for additional information on cumulative impact methodology.

Level of Significance Before Mitigation

This section identifies the level of significance of Proposed Project impacts before mitigation measures are implemented.

Mitigation Measures

This section identifies mitigation measures for each impact criterion when applicable.

Level of Significance After Mitigation

This section identifies the level of significance of Proposed Project impacts after mitigation measures are implemented.

4.1 Aesthetics

This section evaluates the potential impacts on aesthetics resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.1.1 Environmental Setting

The following sections describe the environmental setting for the Project as it relates to aesthetics.

4.1.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address aesthetics.

Federal

No Federal regulations apply to aesthetics.

State

California Scenic Highway Program

The California Scenic Highway Program is managed by the California Department of Transportation (Caltrans). The program was created in 1963 with the goal of protecting the aesthetic significance of the State's scenic highways, as provided in the California Streets and Highways Code, Section 260 et seq. Accordingly, a highway may be designated as "scenic" based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic quality, and the extent to which development intrudes on the traveler's enjoyment of the view. The California Scenic Highway Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such. The California Scenic Highway Program also includes provisions for the Corridor Protection Program, which includes ordinances and planning policies required by jurisdictions to maintain lands visible from the designated scenic highways (Caltrans 2008).

California Building Code

The California Building Code, Part 2 of Title 24 in the California Code of Regulations, is based on the International Building Code and combines three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in the International Building Code.
- Building standards that have been adopted from the International Building Code to meet California conditions.

- Building standards, authorized by the California Legislature, constitute extensive additions not covered by the International Building Code that have been adopted to address particular California concerns.

The California Building Code includes standards for outdoor lighting that are intended to improve energy efficiency, and to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

The Mills Act

The Mills Act is a state law enacted in 1972 that encourages the preservation and maintenance of qualified historic structures. The Mills Act permits cities to enter into agreements with owners of qualified historic structures to preserve and maintain their properties, in exchange for the County Assessor assessing their property at a lower rate by using a formula established by the State.

Regional

Orange County Scenic Highway Plan

The Orange County Scenic Highway Plan identifies a number of landscape corridors and viewscape corridors in the County, and the County desires to preserve the scenic character of these visually important roadways. The Scenic Highway Plan lists officially designated and eligible scenic highways and categorizes them by landscape and viewscape corridors.

Southern California Association of Governments – Connect SoCal RTP/SCS (2024)

The 2024–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), "Connect SoCal," was adopted in April 2024. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, Tribal governments, non-profit organizations, businesses, and local stakeholders in member counties. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. It builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for residents of southern California. Connect SoCal outlines over 4,000 transportation projects through 2045—highway improvements, railroad grade separations, bicycle lanes, new transit hubs, replacement bridges, etc. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emissions reduction goals and Federal Clean Air Act requirements. Connect SoCal also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries, and more

efficient use of resources. Although Southern California Association of Governments does not establish binding aesthetic regulations, the regional plan encourages:

- Compact, walkable development patterns
- Protection of natural open spaces
- Enhancements to visual quality within activity centers
- Context-sensitive corridor design

Local

2003 Brea General Plan – Policies Relevant to Aesthetic Resources

Below are existing General Plan policies relevant to aesthetic resources.

Community Resources Element

The Community Resources Element indicates that scenic resources enhance the visual character of the community and provide distinguishing characteristics; they are invaluable assets that benefit a community. It identifies scenic qualities of the Puente and Chino Hills, which include prominent ridgelines, scenic corridors and canyons, view corridors and vista points, roadways through undisturbed habitat, highways, and natural landscaping. As shown on Figure 4.1-1, Brea Scenic Resources, the Project area is adjacent to Carbon Canyon Regional Park and south and west of Chino Hills State Park. Two view corridors are identified along Rose Drive adjacent to the Project area's southern boundary, with views of the hills to the northeast from urban areas. The Community Resources Element has the following existing goals and policies pertaining to the aesthetic quality of Brea.

- **Goal CR-4:** Preserve open space aggressively for diverse purposes – as a visual and scenic resource, for habitat conservation, to protect watersheds, and for recreation.
  - **Policy CR-4.1.** Protect and preserve open space wherever possible.
  - **Policy CR-4.2.** Select areas for open space preservation using an evaluation system that incorporates the following selection criteria: connectivity, access/recreations, sensitive areas, natural features, subdivision pattern, and buffer zones.
  - **Policy CR-4.3.** Work aggressively with the Orange County, Los Angeles County, State, and other appropriate public agencies, private entities, and landowners to conserve, protect, and enhance open spaces and natural resources, particularly within the sphere of influence.
- **Goal CR-10:** Pursue aggressively the preservation and protection of scenic resources.
  - **Policy CR-10.1.** Create and enforce special standards for development occurring within potential scenic highway corridors.

- **Policy CR-10.2.** Identify streets with unique man-made or natural characteristics for special consideration as scenic routes.
- **Policy CR-10.3.** Manage stands of mature trees, particularly native species, as unique and visual resources.
- **Policy CR-10.4.** Preserve major rock outcroppings as unique landmarks and visual resources to the maximum extent possible.
- **Policy CR-10.5.** Preserve stream courses in their natural state, as they represent a recreation resource, provide community identity, and serve as unifying corridors in the planning area.
- **Policy CR-10.6.** Work aggressively with Orange County, Los Angeles County, State, and other appropriate public agencies, private entities and landowners to conserve, protect and enhance natural resources, particularly within the sphere of influence.

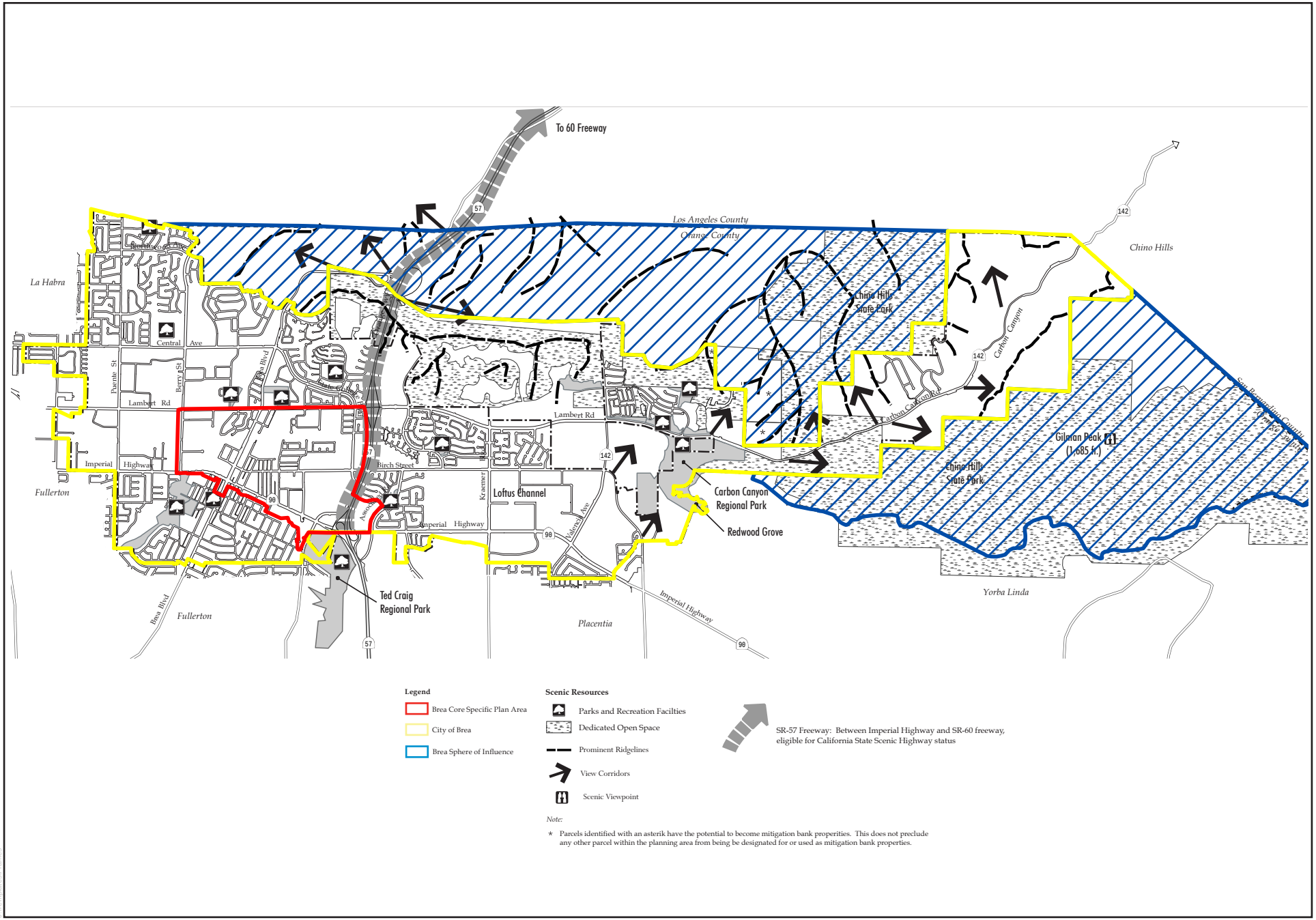
Community Development Element

Eight residential land use designations are established to reflect the diverse residential character of Brea. The residential land use designations include the following: Hillside, Very Low Density, Low Density, Medium Density, High Density, Mixed Use I, Mixed Use II, and Mixed Use III. New development must be compatible with and complement existing residential neighborhoods.

Properties designated Hillside Residential are moderately to severely constrained by unique or significant features such as ridgelines, earthquake faults, steep or unstable slopes, creeks, sensitive habitat, sensitive wildlife species, mapped landslides, soil conditions, accessibility issues, and wildland fire hazards. Such properties are subject to the City's Hillside Residential Ordinance. The Low Density Residential land use designation provides for low-density single-family dwellings and accessory buildings. Types of uses include detached single-family homes and attached single-family residences (townhouses, row houses). Other uses consistent with zoning ordinance requirements include: group homes, religious and similar institutional facilities, public and private schools, hiking and other trails, and public parks.

The Community Development Element provides an urban design plan at a Citywide level, identifying programs and improvements that would enhance the visual character of Brea and create a distinct identity. The Community Development Element has the following goals and policies pertaining to the aesthetic quality of the Brea.

- **Goal CD-1:** Provide a balance of land uses to meet the present and future needs of all residents.
  - **Policy CD-1.1.** Create neighborhoods that effectively integrate single-family and multi-family housing with convenience and neighborhood shopping centers, park and recreation areas, and other uses appropriate for the neighborhoods.



Source: City of Brea; Cotton/Bridges/Associates, 2002.

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Figure 4.1-1

Brea Scenic Resources

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  - **Policy CD-1.4.** Ensure that the City maintains a balance among residential, commercial, and industrial land uses.
  - **Policy CD-1.5.** Provide opportunities for development of housing that responds to diverse community needs in terms of density, size, location, design, and cost.
  - **Policy CD-1.9.** Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile.
  - **Policy CD-1.10.** Preserve open space wherever possible, especially in the hillside areas.

- **Goal CD-2:** Preserve and enhance the character of neighborhoods in northwest Brea.
  - **Policy CD-2.1.** Ensure that the design of new residential developments is sensitive to the character of existing neighborhoods.
  - **Policy CD-2.4.** Preserve existing neighborhood characteristics, including tree-lined streets, sidewalks, and building orientation.
  - **Policy CD-2.5.** Improve existing small, commercial centers to improve access, aesthetics, and business success.

- **Goal CD-4:** Maintain and improve the vitality, economic strength, accessibility, and livability of Downtown.
  - **Policy CD-4.4.** Extend mixed-use development from Downtown along the Brea Boulevard and Birch Street corridors.

- **Goal CD-5:** Preserve Brea's unique historic and cultural resources and neighborhoods.
  - **Policy CD-5.1.** Ensure new development is compatible with the style, theme, and design of established structures and neighborhoods.
  - **Policy CD-5.3.** Provide landscaping and amenities that complement historic resources and neighborhoods.
  - **Policy CD-5.6.** Establish design guidelines of standards for commercial development on South Brea Boulevard that respect and complement the historic character of surrounding neighborhoods.

- **Goal CD-6:** Provide for the revitalization of the South Brea Boulevard Core.
  - **Policy CD-6.2.** Where housing is a component of a project within properties in the Mixed Use III area, the development of ownership housing opportunities shall be encouraged.
  - **Policy CD-6.5.** Encourage the inclusion of open spaces, linkage parks, street trees, and enhanced pedestrian amenities on South Brea Boulevard.

- **Goal CD-7:** Create an environment in Carbon Canyon that balances the community's long-term housing needs with community open space, habitat conservation, and public safety goals.
  - **Policy CD-7.4.** Require that development preserve prominent landforms consistent with the City's hillside management ordinance.
- **Goal CD-8:** Minimize the extent of urban development in the hillsides, and mitigate any adverse consequences associated with urbanization.
  - **Policy CD-8.3.** Require developers to employ sustainable approaches to development and environmentally sensitive design.
  - **Policy CD-8.6.** Ensure that any new development that does occur is integrated effectively into the existing City via convenient street and/or pedestrian connections, as well as visual connections.
  - **Policy CD-8.7.** Work closely with the County of Orange and emphasize the City's need to participate in the development review process of projects proposed in surrounding unincorporated areas. Work to ensure that such developments proceed consistent with City standards.
  - **Policy CD-8.8.** Ensure that height and density levels are limited for development in hillside areas or in areas of steep topography in order to preserve life safety.
- **Goal CD-9:** Create a dynamic, mixed-use urban village that integrates a range of housing types (including senior housing), moderate-intensity commercial uses, educational and public uses, and parks.
- **Goal CD-17:** Promote and maintain a distinct community identity and sense of place that include the presence of identifiable districts and neighborhoods.

Brea City Code

The Brea City Code (BCC), Chapter 20.08, Development Standards, provides basic rules and standards governing how land and buildings may be developed in the City. It defines minimum lot size and dimension requirements, required setbacks (yards), outdoor living-space requirements for residences, special standards for small-lot residential developments, and off-street parking and loading standards (how many spaces, parking layout requirements, where they must be placed, etc.). It also includes regulations for transportation demand management for larger developments, visibility "corner cut-off" requirements at driveways/intersections and requires certain utility service lines to be placed underground.

BCC, Chapter 20.200, R1-H Single Family Residential – Hillside Zone, establishes zoning and development regulations for single-family residential properties in hillside areas that are already substantially developed. Its intent is to guide orderly development while protecting the scenic hillside character of the City. The chapter defines permitted and prohibited uses, sets property

development standards (including lot size, frontage, and grading requirements), and requires planning review for proposed development within this zone. BCC, Chapter 20.206, HR Hillside Residential Zone (hillside management ordinance), has objectives to facilitate and permit the orderly development of property within hillside areas through a set of hillside development standards that protect the public and preserve natural resources.

BCC, Chapter 20.208, R-1 Single Family Residential Zone, establishes permitted uses and development standards to provide an environment conducive to the development of single-family homes, with no mixed use or incompatible uses.

BCC, Chapter 20.212, R-1 (5,000) Single Family Residential Zone, establishes zoning regulations for single-family residential properties on lots with a minimum size of 5,000 square feet. Its purpose is to guide and regulate land use within this zone by identifying permitted uses, prohibiting incompatible uses, and prescribing property development standards such as minimum lot area and dimensions, dwelling density limits, building height limits, access and parking requirements, and applicable sign provisions. These standards help ensure orderly residential development that is consistent with neighborhood character and public health, safety, and welfare.

BCC, Chapter 20.216, R-2 Multiple Family Residential Zone, establishes zoning regulations for areas intended to accommodate low-density multiple-family housing. Its purpose is to govern land use in the R-2 zone by identifying permitted uses and expressly prohibited uses, prescribing property development standards (including minimum lot area and dimensions, building placement, density, parking, access, and other design criteria), and requiring review of proposed developments to ensure compliance with applicable planning standards. These provisions help facilitate orderly residential development that protects neighborhood character and the public health, safety, and welfare.

BCC, Chapter 20.220, R-3 Multiple Family Residential Zone, establishes zoning and development regulations for high-density multifamily residential areas, allowing development of apartments, condominiums, and similar housing. Its purpose is to govern permitted and prohibited land uses, prescribe property development standards (including lot size and dimensions, dwelling density, building heights, setbacks, outdoor living space, lot coverage, parking, signage and lighting), and ensure orderly residential development that is consistent with community character and protective of public health, safety, and welfare.

BCC Chapter 20.258, Mixed-Use Zoning -Districts, governs site planning, building form/density, open space, setbacks, FAR, design review, and other standards for mixed-use projects.

BCC Chapter 20.74, Tree Preservation, acknowledges that certain native trees are important ecological and aesthetic resources that improves the quality of life for the City's residents, visitors and wildlife and to ensure preservation or propagation of such trees. This BCC chapter applies to any parcel that contains any commercial use (excluding home occupations), any commercially

zoned parcels, and any parcel or any combination of parcels within a project site that are equal or greater than 20,000 square feet located within City limits. Table 20.73.020.A of the Chapter provides protected tree types and criteria. The protected trees are all *Quercus* varieties (Oak), all *Salix varieties* (Willow), all *Platanus varieties* (Sycamore), *Hesperocyparis forbesii* (Tecate Cypress), *Juglans californica* (southern California black walnut), *Populus trichocarpa* (Black Cottonwood), *Populus fremontii* (Fremont Cottonwood), and *Alnus rhombifolia* (White Alder) that meets the stated minimum diameter at breast height.

2017 Brea Envisions Community Strategic Plan

The 2017 Brea Envisions Community Strategic Plan (2017 Brea Envisions) was a community-driven effort identifying the values shaping Brea for the next 20 years. This effort to define the strategies was produced to allow City leaders to plan for the future. Goals and expectations of the 2017 Brea Envisions process are to:

- Engage and inform the community
- Identify a Community Vision
- Develop a strategic plan to guide policy, decisions, and budgeting choices
- Provide implementation steps and inform updates to the Parks, Recreation and Human Services Plan; develop a Cultural Arts Plan; a focused update of the General Plan, and contemplated actions to make City services and operations efficient and responsive to the identified community needs

The 2017 Brea Envisions reflects broad resident input and sets community vision priorities related to aesthetics, such as protection of hillside and open space character; enhance the Downtown and mixed-use corridors; strengthen Brea's unique design identity; and promote public art and high-quality site design.

2020 Brea Core Active Transportation Plan

As part of advancing community-driven initiatives from the 2017 Brea Envisions, the 2020 Brea Connecting the Core Active Transportation Plan represents a collaborative community-based effort to prepare a Plan for improving mobility for bicyclists, pedestrians, transit riders, and motorists in the heart of the City. With funding provided by Caltrans through a Sustainable Transportation Planning Grant, this Plan provides a set of implementable actions to guide future improvements and serves as a foundation for a safe, sustainable, and connected community. The plan includes aesthetic guidance such as:

- Pedestrian-scale street lighting
- Streetscape improvements (street trees, buffers, paving)
- Corridor beautification strategies
- Trail and bikeway visibility improvements

4.1.1.2 Existing Conditions

Scenic Vistas and Resources

The City of Brea has a unique visual character. It is bordered by the natural backdrop of the Puente and Chino Hills. These hills offer a variety of scenic resources including open space areas, ridgelines, creeks and riparian areas, and vegetation and natural landscaping. Vista points can be found throughout Brea either from urban areas with views of the hillsides or from wilderness areas via trails with views of Brea (City of Brea 2003). The topography of the City Brea and its Sphere of Influence transitions from low- to moderate-elevation urbanized terrain in the City core to significant hillside and ridgeline systems at the community's periphery as shown on Figure 4.1-2, 50-Foot Contour Lines. This combination of plains, foothills, and surrounding highland features strongly influences land use patterns, scenic views, and the character of the natural open space areas surrounding the City.

Long-distance views of natural terrain and vegetation can be found from locations within the Chino Hills State Park. Chino Hills Park includes 14,102 acres of oaks, sycamores and rolling, grassy hills that stretch nearly 31 miles (50 km), from the Santa Ana Mountains to the Whittier Hills encompassing the Puente Hills. Chino Hills is vitally important as a refuge to many species of California native plants, and as a link between natural habitat areas essential to the survival of many wildlife species. The park is located near the intersection of Orange, Riverside, and San Bernardino Counties.

The City's visual environment is shaped by a combination of natural landforms, suburban residential neighborhoods, established commercial corridors, and distinct hillside open space areas that form the community's most prominent scenic backdrop. Broad views of the surrounding hillsides, including the Puente Hills to the west and northwest and the Chino Hills to the east, contribute significantly to the City's overall visual character. These natural features create a sense of enclosure along many east/west roadways and provide long-range public views from numerous vantage points throughout the community. In particular, views of natural ridgelines, wooded slopes, and wide open spaces are highly valued and influence the City's land use policies.

Most of the City's developed areas are characterized by suburban and urban land uses that exhibit a range of architectural styles, intensities, and visual qualities. Residential neighborhoods consist largely of single-family and medium-density homes with landscaped streets, localized variations in building scale, and consistent development patterns that create a cohesive suburban appearance. Commercial and mixed-use corridors such as Imperial Highway (SR-90), Birch Street, and Brea Boulevard display a more varied visual character, containing a mix of one- to five-story structures, surface parking and structures, retail signage, and contemporary building forms. Industrial districts in the northwest portion of the City contribute to a more utilitarian character, with larger building footprints, screened equipment, and limited landscape features. Despite these differences, the

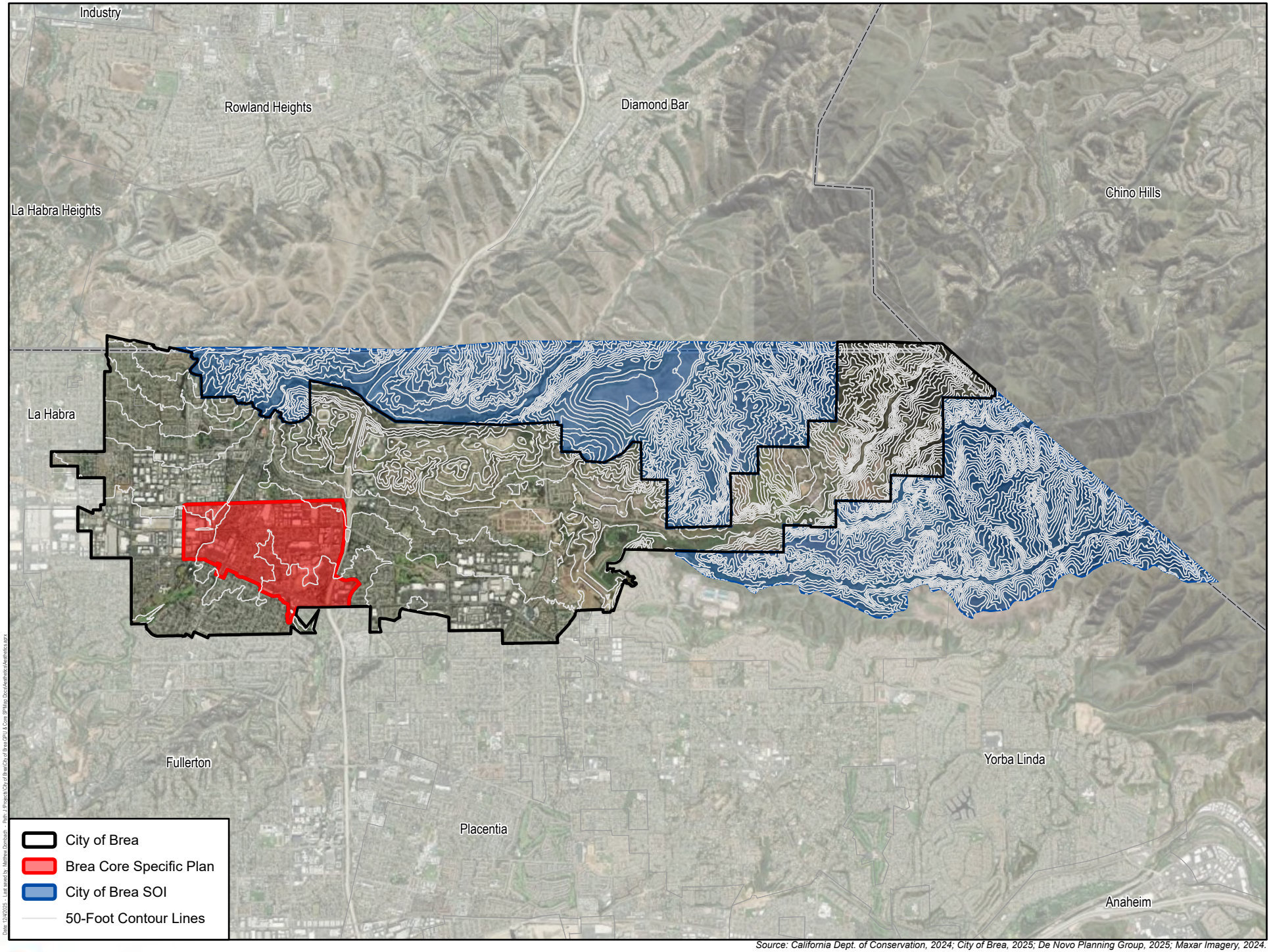
visual environment across the built portions of Brea is generally well-maintained and reflects established standards for design, landscaping, and lighting.

Overall, Brea's existing visual environment is characterized by a combination of well-established suburban and urban development patterns set against a backdrop of significant natural landforms and open space resources. The interplay between built and natural elements, particularly the contrast between developed corridors and the surrounding hillsides, forms the foundation of the City's visual identity and serves as the baseline for evaluating aesthetic impacts associated with the Proposed Project. The City maintains an Art in Public Places Program which was established in 1975 that requires or encourages the incorporation of public art into new development and public projects. The program is intended to enhance the visual quality and character of the City by integrating artwork into buildings, streetscapes, plazas, and other public spaces. Implementation of the program contributes to visual interest, community identity, and compatibility between new development and surrounding areas.

Scenic Vistas and Resources

Vista points can be found throughout Brea both from urban areas toward the hills and from wilderness areas looking back onto Brea. The landscape in Chino Hills State Park has been relatively unaltered by human activity, especially compared to the surrounding environment. Long-distance views of natural terrain and vegetation can be found throughout the park. The Chino Hills State Park Master Plan emphasizes acquiring ridgelines and ridgetops to protect viewsheds within the Chino Hills State Park. Views of the hills from Telegraph Canyon and from selected panoramic points have been mostly protected from urban encroachments. A viewpoint of particular interest is Gilman Peak (1,685-foot elevation) located in the Chino Hills State Park (City of Brea 2003). Main trails take hikers and cyclists to points with views of Orange County and the surrounding hills. The ridgelines from Sonome Canyon, Soquel Canyon, and Lions Canyon provide scenic viewpoints of natural rolling hills with Southern California black walnut and coast live oak trees found on the north-facing slopes.

Hillside areas to the north and east of the urbanized core form some of the City's most significant scenic resources. These areas consist of steep slopes, natural ridgelines, rock outcrops, native vegetation, and open space lands that create a distinctive natural edge around the community. Much of this hillside terrain remains undeveloped and is protected through local zoning, conservation policies, and the City's Hillside Residential Zone Ordinance (BCC, Chapter 20.206). Public viewpoints along Carbon Canyon Road (SR-142), Lambert Road, and various residential neighborhoods provide expansive views of these natural features. Because many of the hillside slopes are visible from long distances, their preservation contributes meaningfully to Brea's identity and sense of place.



Source: California Dept. of Conservation, 2024; City of Brea, 2025; De Novo Planning Group, 2025; Maxar Imagery, 2024.

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Figure 4.1-2
50-Foot Contour Lines

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State Scenic Highways

No roadways within the City are currently designated as official State Scenic Highways (Caltrans 2008). State Route 57 (SR-57) Freeway, between SR-60 and Imperial Highway (SR-90), is identified as an Eligible California State Scenic Highway but is not an Officially Designated one. Carbon Canyon Road (SR-142) outside of the City's northeastern jurisdictional boundary in San Bernardino County and traveling northeast hillside areas to Peyton Street in Chino Hills, is also identified as an Eligible State Scenic Highway due to its natural setting and surrounding topography. As with SR-57, Carbon Canyon Road (SR-142) is not an officially designated State Scenic Highway. Carbon Canyon Road (SR-142)_from the City's northeast boundary to a point before Valencia Avenue is identified as a viewscape corridor by the Orange County Scenic Highway Plan (County of Orange 2005). Eligibility does not confer regulatory protection under the Scenic Highway Program.

Nighttime Lighting

Nighttime lighting conditions within the City vary depending on land use intensity and proximity to commercial or residential activity. Urbanized areas, including Downtown, major corridors, and employment centers, contain higher concentrations of nighttime lighting from building-mounted fixtures, illuminated signs, vehicle headlights, streetlights, and parking lot lighting. These areas exhibit typical levels of urban skyglow, although the City's lighting regulations require shielding, cutoff fixtures, and limits on light spill to protect adjacent uses. Residential neighborhoods generally maintain lower illumination levels, resulting in softer nighttime visual environments. Industrial areas contain bright point-source lighting, security lighting, and illuminated operations. The hillside and open space areas, particularly near Carbon Canyon and the eastern Sphere of Influence, experience very low levels of nighttime lighting, contributing to dark-sky conditions that contrast with the more illuminated portions of the City. These darker areas are important for maintaining natural night environments and preserving the visual quality of views toward the hillsides during nighttime hours.

4.1.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Project would have a significant impact on aesthetics if it would:

- **Threshold AES-a:** Have a substantial adverse effect on a scenic vista.
- **Threshold AES-b:** Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- **Threshold AES-c:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point.) If the project is in

an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

- **Threshold AES-d:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and help reduce or avoid potential impacts related to aesthetics:

PPP AE-1 Development projects will be designed and constructed so that it would not conflict with the intent of the Brea City Code, Chapter 20.206, Hillside Residential Zone. In accordance with Section 20.206.210(A), Other Regulations, Exterior Lighting, exterior lighting will be properly shielded to avoid glare and the spill of light to surrounding areas. Low-level lighting and the use of multiple low-profile fixtures will be used instead of fewer but taller fixtures. The project will be designed so that emphasis on exterior lighting is on safety and landscaping lighting as opposed to building. The project applicant will present descriptions of exterior lighting in the design guideline manual required by Brea City Code, Section 20.206.050.

PPP AE-2 The Brea Core Specific Plan area will be designed and developed to be consistent with the new zoning designations and development standards contained in the Brea City Code applicable to the Brea Core area, which establishes allowable land uses, building form, and site development standards, such as height, setbacks, parking, and objective design standards.

PPP BIO-2 Development implemented under the Proposed Project will be subject to the Brea City Code Chapter 20.74, Tree Preservation, and preserve and propagate the protected trees as defined therein.

4.1.4 Environmental Impacts

The following sections address various potential impacts relating to aesthetics that could result from implementation of the Project.

4.1.4.1 Threshold AES-a: Have a substantial adverse effect on a scenic vista.

Impact Analysis

Focused General Plan Update

Vista points can be found throughout Brea, both from urban areas to the hills and from open spaces and ridgelines looking to Brea. Long-distance views of and from Chino Hills State Park are identified as scenic resources by both the City of Brea and the City of Chino Hills General Plans. A designated scenic viewpoint is at Gilman Peak at approximately 1,685 feet elevation in the City's Sphere of Influence as shown on Figure 4.1-1. Scenic view corridors are most visible from SR-57 traveling north–south through the City; Imperial Highway (SR-90), particularly near the eastern boundary; Carbon Canyon Road (SR-142); Lambert Road; and Valencia Avenue. The Scenic Highway Plan of the County of Orange General Plan further designates Carbon Canyon Road as a viewscape corridor.

Implementation of the Focused GPU would accommodate future development primarily within already urbanized areas. Scenic vistas in Brea are dominated by views of the Puente Hills, Chino Hills State Park, and natural open space areas. Existing local regulations (refer to Section 4.1.1.1, Regulatory Setting, and Section 4.1.3, Plans, Programs, and Policies), including the Hillside Residential Ordinance, zoning standards, and General Plan policies protect ridgelines, limit grading, and reduce view obstruction. The Focused GPU's Community Resources Element Goal CR-4, Scenic Resources, seeks to create a community where visual resources reflect Brea's natural beauty and help guide responsible development, and Community Development Goal CD-4, Hillside Development, seeks to minimize the extent of development in the hillsides and mitigate any adverse consequences associated with urbanization, and these goals, along with their associated policies and actions, would support protecting scenic resources in Brea while accommodating growth in a controlled manner. Specific policies and actions are included in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, of this PEIR. Additionally, corridor intensification would occur away from major scenic viewsheds. The Focused GPU goals, policies, and actions would support view preservation and compatibility, and with regulatory compliance with existing BCC, impacts with regard to scenic vistas would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The BCSP encompasses a highly urbanized 778.97-acre area located within the City's central area bounded generally by Lambert Road, State College Boulevard, Imperial Highway, and Berry Street. As shown on Figure 4.1-1, the BCSP area does not contain any scenic resources including parks and recreation facilities, dedicated open space, prominent ridgelines, view corridors, or scenic

viewpoints. Existing views are predominantly limited by the urbanized context, flat terrain, and intervening development. No officially designated scenic resources or long-range public views are present. While redevelopment may alter local views or increase building mass in certain districts, these changes would not obstruct any protected scenic resources. As there are no designated scenic vistas within or adjacent to the BCSP area, effects on scenic vistas would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.1.4.2 Threshold AES-b: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

The City of Brea contains no officially designated State Scenic Highways. State Route-57 within the City limits is eligible but not designated as a State Scenic Highways. Implementation of the Project does not propose development that would occur in proximity to an officially designated State scenic highway. Further, the Focused GPU's Community Resources Element Goal CR-4, Scenic Resources, seeks to create a community where visual resources reflect Brea's natural beauty and help guide responsible development, and Community Development Goal CD-4, Hillside Development, seeks to minimize the extent of development in the hillsides and mitigate any adverse consequences associated with urbanization, and these goals, along with their associated policies and actions, would support protecting scenic resources in Brea while accommodating growth in a controlled manner. Specific policies and actions are included in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, of this PEIR. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

Focused General Plan Update

Implementation of the Focused GPU would primarily affect areas within the City's incorporated limits, most of which are urbanized and characterized by established residential neighborhoods, commercial corridors, industrial districts, and a developed downtown core. In these urbanized portions of the Project area, future development facilitated by the Focused GPU, such as the changes proposed for the Mixed Use 50 land use category, which would allow an additional 1,035 residential units and approximately 3.3 million square feet of non-residential uses, would occur in settings where visual change is anticipated and guided by existing zoning, design standards, and policies established in the Community Development Element of the City's General Plan that emphasize high-quality architecture, compatible scale transitions, and enhanced public realm design. As such, development in urbanized areas would be required to comply with zoning regulations, specific plan standards, and updated design and placemaking policies that collectively protect visual character and scenic quality. The City's Art in Public Places Program would also help ensure that future development includes design elements that enhance aesthetic quality and reduce the potential for adverse visual impacts.

In the non-urbanized portions of the Project area, including the eastern hillsides, canyons, and largely undeveloped areas within the sphere of influence, the Focused GPU does not propose new development potential beyond what is already permitted under the existing 2003 General Plan. These areas consist primarily of designated open space, parkland, and hillside residential uses with limited access and minimal visual modification expected under the proposed land use framework. New or expanded development in these areas would continue to be subject to hillside development standards, conservation policies, and viewshed protections intended to preserve natural landforms, scenic vistas, and the visual quality of public views from roadways, parks, and regional open space. Relevant supporting goals, policies, and actions related to visual character or quality from the Focused GPU are included in the Community Development Element, Goal CD-2 Community Design and Placemaking, Goal CD-3, Neighborhood Preservation, and Goal CD-4, Hillside Development. Goal CD-2 seeks to create a visually appealing and cohesive community that emphasizes high-quality design, celebrates Brea's distinct character, and fosters a strong sense of place through well-designed spaces, architecture, and streetscapes; Goal CD-3 seeks to preserve the safety and tranquility of established residential neighborhoods that contribute to the quality of life in Brea, while fostering opportunities for social interaction and enhancing community connections; and Goal CD-4 seeks to minimize the extent of development in the hillsides and

mitigate any adverse consequences associated with urbanization. Specific policies and actions are included in Appendix C, Brea 2025 General Plan: Goals, Policies, and Actions, of this PEIR. Furthermore, the Focused GPU includes Appendix A, Urban Design, which identifies key components that define the City's visual form and provides a broad structure to guide future development. This Appendix A provides urban design framework for public spaces, travelways, and private spaces.

Therefore, while the Project would allow changes to the built environment in already urbanized locations, those changes would occur under regulatory controls designed to maintain scenic quality, and the Project would not introduce substantial visual degradation in non-urbanized areas.

Implementation of the Focused GPU would not degrade the existing visual character or conflict with zoning or regulation for scenic quality. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The highly urbanized Brea Core Area of the BCSP within the City's central area includes the Downtown, Birch Street Promenade, Brea Civic & Cultural Center, Brea Mall, commercial corridors, multi-family neighborhoods, and established mixed-use and employment areas. Because the BCSP area is fully developed and urban in character, public views are dominated by built form, hardscape, signage, urban streetscape features, and a compact mix of commercial and residential structures. Implementation of the BCSP would allow targeted intensification, redevelopment, connectivity and streetscape enhancement projects that would alter the urban visual environment; however, such changes would occur within an already visually urban context and would be fully regulated by the BCSP's land use standards, building form requirements, design guidelines, public realm policies, and site-planning regulations. These standards ensure cohesive architecture, pedestrian-scaled design, appropriate massing transitions to adjacent neighborhoods, and enhancement, not degradation, of public views within the core area.

As the BCSP establishes its own comprehensive zoning, development standards, and design framework, each expressly created to guide high-quality architectural and visual outcomes, future development consistent with the BCSP would, by definition, align with the applicable regulatory framework governing scenic quality. Therefore, implementation of the BCSP would not conflict with scenic quality regulations and would not result in substantial adverse effects on visual character or public views within this urbanized area.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.1.4.4 Threshold AES-d: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact Analysis

Focused General Plan Update

The Focused GPU applies to the entire City of Brea and its sphere of influence, which includes a mix of dense urban neighborhoods, commercial corridors, light industrial areas, suburban residential districts, and extensive non-urbanized open space and hillside terrain in the northern and eastern portions of the planning area. Implementation of the Focused GPU would enable new development and redevelopment within largely urbanized portions of the City. These areas already contain substantial sources of nighttime lighting associated with commercial uses, roadways, parking areas, and residential neighborhoods. Future development facilitated by the Project would introduce additional lighting associated with buildings, signage, streetscape improvements, pedestrian pathways, and parking facilities; however, these sources would be required to comply with existing City standards and updated design guidelines that regulate fixture shielding, illumination levels, light spillover, and overall nighttime lighting design. The Focused GPU's Community Development and Community Resources policies emphasize minimizing light trespass, enhancing dark-sky compatibility where feasible, and ensuring that new development integrates lighting in a manner consistent with community character and pedestrian safety.

Within the urbanized western and central areas, including established neighborhoods and major roadways such as Imperial Highway, Lambert Road, and Brea Boulevard, future development facilitated by the Focused GPU would introduce new lighting sources associated with infill projects, mixed-use opportunities, and redevelopment. However, these areas already exhibit high ambient lighting levels, and all future projects would be subject to the City's zoning ordinance, outdoor lighting standards, and updated General Plan policies that require shielded fixtures, reduced glare, minimized light spillover, and dark-sky-compatible lighting design.

In contrast, the non-urbanized hillside and natural open space areas north of Carbon Canyon Road (SR-142) and east toward Chino Hills contain very low nighttime illumination and are valued for their dark-sky conditions and visual sensitivity. The Focused GPU does not increase development potential in these areas beyond what is currently allowed under the 2003 General Plan. Any future projects in these hillside and open space areas would continue to be regulated under existing hillside standards, specific plans (e.g., Olinda Ranch, Tonner Hills, Brea 265), and resource-protection policies that limit visibility, glare, and night-sky effects.

Policy CR-5.9, below, from the Focused GPU's Community Resources Element is relevant:

- **Policy CR-5.9 Outdoor Lighting.** Mitigate the harmful effects of light pollution.

As a result, while future urbanized-area development under the Focused GPU may increase localized lighting, it would do so under regulatory controls designed to avoid substantial new glare or adverse effects on day or nighttime views, and the Project would not introduce significant lighting increases in non-urbanized areas. A less than significant impact would occur.

Brea Core Specific Plan

The BCSP encompasses a 778.97-acre fully urbanized district at the center of the City bounded generally by Lambert Road to the north, State College Boulevard and Associated Road to the east, Imperial Highway to the south, and Berry Street to the west. This area contains Downtown, Birch Street Promenade, Brea Civic & Cultural Center, the Brea Mall vicinity, major arterial corridors, shopping centers, multi-family neighborhoods, commercial/office districts, and light industrial pockets. These existing uses already produce substantial nighttime lighting from streetlights, building illumination, signage, parking lots, pedestrian spaces, and commercial activity.

Implementation of the BCSP would result in new lighting sources associated with mixed-use intensification, streetscape enhancements, new pedestrian and bicycle connections, public open space improvements, and redevelopment along key corridors such as Birch Street, Brea Boulevard, and Imperial Highway. However, because the BCSP area is already characterized by high ambient nighttime lighting, additional lighting would not extend into previously dark or visually sensitive areas. Furthermore, the BCSP includes detailed lighting and design guidelines, requirements for fixture shielding, limits on glare, standards preventing light spillover onto adjacent neighborhoods, and policies promoting consistent, pedestrian-oriented illumination that supports safety without over-lighting the urban environment. As a result, lighting introduced within the BCSP would be carefully regulated and integrated into an already illuminated urban context, preventing the creation of substantial new sources of light or glare that would adversely affect day or nighttime views. A less than significant impact would occur.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.1.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to aesthetics that could result from implementation of the Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.1.5.1 Cumulative Threshold AES-a: Have a substantial adverse effect on a scenic vista.

Focused General Plan Update and Brea Core Specific Plan

The City of Brea includes several publicly accessible vantage points offering scenic vistas, particularly from hillside and open space areas in the northern and eastern portions of the planning area. Cumulatively, development within the City and sphere of influence has gradually altered some view corridors, especially near urban edges. However, policies and regulations in the Focused GPU, along with specific plans like Olinda Ranch and Tonner Hills, preserve key ridgelines and view corridors by limiting development intensity and preserving natural landforms.

Given these protections, the Project's contribution to cumulative degradation of scenic vistas is not expected to be substantial. The Project complies with the Citywide goals to maintain view corridors and minimize visual intrusion on scenic ridgelines. Moreover, the BCSP area is fully urbanized, where scenic vistas are limited, so cumulative effects on scenic vistas from development in this zone are negligible.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.1.5.2 Cumulative Threshold AES-b: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Focused General Plan Update and Brea Core Specific Plan

No portions of the Project area fall within or immediately adjacent to a designated State Scenic Highway corridor. Consequently, cumulative impacts to scenic resources specifically associated with State Scenic Highways are not anticipated. Existing policies that protect significant natural features and scenic resources in the broader planning area further reduce the potential for cumulative damage to scenic resources. As such, the Project's incremental contribution to cumulative damage to scenic resources is considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

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

Focused General Plan Update and Brea Core Specific Plan

The cumulative effect of the Project, in combination with other developments guided by the Project, is addressed by existing zoning, design standards, and resource-protection policies that apply Citywide. In non-urbanized areas, cumulative development is limited by strict hillside and open space policies, which preserve the natural visual character and minimize impacts on public views experienced from publicly accessible vantage points. Therefore, cumulative degradation of visual quality in these sensitive areas is unlikely.

Within the urbanized Brea Core, cumulative changes result from redevelopment and intensification consistent with zoning and design guidelines that promote cohesive and attractive urban environments. The BCSP provides design framework ensuring that new development enhances or maintains visual quality and does not conflict with scenic quality regulations.

Overall, cumulative effects on visual character and public views would be less than significant due to the Project's consistency with adopted plans and the continuation of established design and development controls.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.1.5.4 Cumulative Threshold AES-d: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Focused General Plan Update and Brea Core Specific Plan

Cumulative light and glare impacts stem from urban growth, street lighting, commercial signage, and vehicle headlights across the City and surrounding areas. The Project's contribution, alongside existing and foreseeable developments, would introduce new sources of light and glare typical of urban and mixed-use settings.

However, the City of Brea's lighting ordinances, design guidelines, and landscape standards incorporate measures to minimize off-site light spill, glare, and nighttime sky glow, particularly in proximity to residential neighborhoods and open space areas. The Focused GPU emphasizes dark-sky principles in non-urbanized zones to protect night views. The BCSP similarly enforces standards to control lighting in the core area.

With these regulatory controls, the Project's incremental contribution to cumulative light and glare effects would be effectively managed, and cumulative impacts related to light and glare would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.1.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds AES-a through AES-d would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP AES-1, PPP AES-2, PPP BIO-2, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.1.7 Mitigation Measures

No mitigation measures are required.

4.1.8 Level of Significance After Mitigation

Not applicable.

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4.2 Air Quality

This section evaluates the potential for impacts on air quality resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project). The Project encompasses the City of Brea (City) and its Sphere of Influence (SOI). The City's incorporated boundaries and the SOI together compose the Focused GPU planning area.

4.2.1 Environmental Setting

The following sections describe the environmental setting for the Project as it relates to air quality.

4.2.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address air quality.

Federal

Federal Clean Air Act (U.S. Code, Title 42, Section 7401 et seq.)

The Clean Air Act (CAA) of 1970 is the comprehensive Federal law that regulates air emissions from stationary and mobile sources. The CAA authorizes the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants. Current NAAQS are listed in Table 4.2-1, National and California Ambient Air Quality Standards. The primary standards listed in Table 4.2-1 have been set at levels intended to protect public health. The USEPA has classified air basins (or portions thereof) as being in "attainment," "non-attainment," or "unclassified" for each criteria air pollutant based on if the NAAQS have been achieved. Non-attainment areas are air basins that do not meet one or more of the California Ambient Air Quality Standards (CAAQS) and are subject to additional restrictions as required by the USEPA. If an area is designated unclassified, it is because inadequate air quality data was available as a basis for a non-attainment or attainment designation. The USEPA classifies the South Coast Air Basin as in attainment for the Federal carbon monoxide (CO), nitrogen dioxide (NO_2), lead, respirable particulate matter (PM_{10}), and sulfur dioxide (SO_2) standards. The South Coast Air Basin is classified as extreme non-attainment for the Federal ozone (O_3) standard and serious non-attainment for the fine particulate matter ($PM_{2.5}$) standard (South Coast AQMD 2016). Table 4.2-2, South Coast Air Basin Attainment Status, lists the attainment status of the South Coast Air Basin for criteria air pollutants.

Table 4.2-1. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c, d]	Secondary[c, e]
Ozone (O_3)[f]	1-Hour	0.09 ppm (180 µg/m³)	—	Same as Primary Standards
	8-Hour	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)	
Respirable Particulate Matter (PM_{10})[g]	24-Hour	50 µg/m³	150 µg/m³	Same as Primary Standards
	Annual Arithmetic Mean	20 µg/m³	—	
Fine Particulate Matter ($PM_{2.5}$)[g]	24-Hour	—	35 µg/m³	Same as Primary Standards
	Annual Arithmetic Mean	12 µg/m³	9 µg/m³	15 µg/m³
Carbon Monoxide (CO)	8-Hour	9 ppm (10 mg/m³)	9 ppm (10 mg/m³)	None
	1-Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	
Nitrogen Dioxide (NO_2)[h]	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	Same as Primary Standard
	1-Hour	0.18 ppm (470 mg/m³)	100 ppb (188 µg/m³)	
Sulfur Dioxide (SO_2)[i]	Annual Arithmetic Mean	—	0.030 ppm (for certain areas)	—
	24-Hour	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)	—
	3-Hour	—	—	0.5 ppm (1,300 µg/m³)
	1-Hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³)	—
Lead [j, k]	30-Day Average	1.5 µg/m³	—	—
	Calendar Quarter	—	1.5 µg/m³ (for certain areas)	Same as Primary Standard
	Rolling 3-Month Average[7]	—	0.15 µg/m³	
Visibility-Reducing Particles[L]	8-Hour	Refer to Footnote l	No National Standards	
Sulfates	24-Hour	25 µg/m³	No National Standards	
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	No National Standards	
Vinyl Chloride [j]	24-Hour	0.01 ppm (26 µg/m³)	No National Standards	

Source: CARB 2025a.

Notes: ppb = parts per billion; ppm = parts per million; µg/m³ = micrograms per cubic meter

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, $PM_{2.5}$, and visibility-reducing particles are values that are not to be exceeded. The standards for sulfates, lead, hydrogen sulfide, and vinyl chloride standards are not to be equaled or exceeded. The CAAQS are listed in the Table of Standards in California Code of Regulations, Title 17, Section 70200.

[b] National standards (other than O_3, PM, and those based on annual averages) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in 1 year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parenthesis are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15.0 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 were also retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[h] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[i] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard, the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[j] The California Air Resources Board (CARB) had identified lead and vinyl chloride as toxic air contaminants (TACs) with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[l] In 1989, CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the Statewide and Lake Tahoe Air Basin standards, respectively.

Table 4.2-2. South Coast Air Basin Attainment Status

Pollutant	California Standards	National Standards
Ozone (O_3) (1-Hour)	Non-attainment	No National Standard
Ozone (O_3) (8-Hour)	Non-attainment	Non-attainment
Respirable Particulate Matter (PM_{10})	Non-attainment	Attainment
Fine Particulate Matter ($PM_{2.5}$)	Non-attainment	Non-attainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Lead	Attainment	Attainment (in Project area)
Sulfur Dioxide (SO_2)	Attainment	Attainment/Unclassified[a]

Source: South Coast AQMD 2016.

Note:

[a] Unclassified; indicates data is not sufficient for determining attainment or non-attainment.

The CAA requires states to develop a plan to attain and maintain the NAAQS in all areas of the country and a specific plan to attain the standards for each area designated non-attainment for the NAAQS. These plans, known as State Implementation Plans, are developed by State and local air quality management agencies and submitted to the USEPA for approval. The State Implementation Plan includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The State Implementation Plan is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them.

State

Air Quality and Land Use Handbook: A Community Health Perspective

The California Air Resources Board (CARB) developed the Air Quality and Land Use Handbook: A Community Health Perspective to provide guidance on land use compatibility with sources of toxic air contaminants (TACs) (CARB 2005). These sources include freeways and high traffic roads, commercial distribution centers, rail yards, refineries, dry cleaners, gasoline stations, and industrial facilities. The handbook is not a law or adopted policy but offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs. The handbook indicates that land use agencies must balance other considerations, including housing and transportation needs, economic development priorities, and other quality-of-life issues.

California Ambient Air Quality Standards

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of air pollution control programs in California. The CAA allows States to adopt ambient air quality standards and other regulations if they are at least as stringent as Federal standards. California has adopted the CAAQS that are equal to or stricter than the Federal standards for six criteria air pollutants. The CAAQS are listed in the Table of Standards in California Code of Regulations, Title 17, Section 70200, and provided in Table 4.2-1. Similar to the NAAQS, areas have been designated as attainment, non-attainment, or unclassified with respect to the CAAQS. As shown in Table 4.2-2, the South Coast Air Basin is in non-attainment with the CAAQS for O_3, PM_{10}, and $PM_{2.5}$, and is designated as an attainment area for the State CO, NO_2, SO_2, and lead.

Toxic Air Contaminant Regulations

California regulates TACs primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Hot Spots Act). The act sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB designates a substance as a TAC. To date, CARB has designated nearly 200 compounds as TACs. The majority of estimated health risks from TACs can be attributed to a relatively small number of compounds, the most important being PM from diesel-fueled engines (i.e., diesel particulate matter [DPM]).

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

The California Green Building Standards Code (CALGreen) contains mandatory requirements for new residential and non-residential buildings throughout California. CALGreen is Part 11 of the California Building Standards Code (Title 24 of the California Code of Regulations). The 2022 Standards applied to new construction as well as additions and alterations to residential and non-

residential buildings through December 31, 2025. The 2025 CALGreen standards went into effect on January 1, 2026, and currently govern new construction and applicable additions and alterations. CALGreen outlines VOC limits for architectural applications, sealants, adhesives, and coatings. It also references and incorporates limits established by other agencies, including South Coast AQMD and California Department of Public Health requirements.

Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (AQMD) develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. The South Coast AQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs). The most recent of these AQMPs was adopted by the South Coast AQMD Governing Board on December 2, 2022.

The 2022 AQMP is focused on attaining the 2015 8-hour ozone standard for the South Coast Air Basin and Coachella Valley. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP strategy includes the following:

- Wide adoption of zero emissions technologies anywhere available.
- Low NO_X technologies where zero emissions are not feasible.
- Federal Action.
- Zero emissions technologies for residential and industrial sources such as water and space heaters in buildings and homes regionwide.
- Incentive funding in environmental justice areas.
- Prioritize benefits on the most disadvantaged communities.

During construction and operation, the development under the proposed General Plan must comply with applicable rules and regulations adopted by the South Coast AQMD. The following are South Coast AQMD rules that the Project may be required to comply with, either directly, or indirectly:

- **Rule 402:** Prohibits a person from discharging 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.

- **Rule 403:** Governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through the application of standard Best Management Practices.
- **Rule 445:** Prohibits permanently installed wood burning devices into any new development.
- **Rule 1108:** Governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule regulates the VOC content of asphalt used during construction.
- **Rule 1113:** Serves to limit the VOC content of architectural coatings used on projects in the South Coast Air Basin. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast Air Basin must comply with the current VOC standards set in this rule.
- **Rule 1303:** Governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM_{10} among other pollutants.
- **Rule 1401:** New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.
- **Rule 2305:** The Warehouse Indirect Source Rule requires owners and operators associated with warehouses 100,000 square feet or larger to directly reduce NO_X and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

Air Quality Guidance Documents

South Coast AQMD CEQA Air Quality Handbook

Although the South Coast AQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the South Coast Air Basin. Instead, this is controlled through local jurisdictions in accordance with the California Environmental Quality Act (CEQA). To assist local jurisdictions with air quality compliance issues, the South Coast AQMD first published the CEQA Air Quality Handbook in 1993. Sections of the Air Quality Handbook are now obsolete; however, South Coast AQMD continues to issue guidance to assist with air quality analysis until a new handbook is prepared. The purpose of the CEQA Air Quality Handbook and subsequent guidance is to assist lead agencies, as well as consultants, project proponents, and other interested parties in evaluating a project's potential air quality impacts. Relevant thresholds are incorporated into the impact analysis in Section 4.2.4.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the Federally designated metropolitan planning organization for the majority of the Southern California region and is the largest metropolitan planning organization in the nation. With respect to air quality planning, SCAG has prepared the Regional Transportation Plan and Regional Transportation Improvement Plan, which addresses regional development and growth forecasts. These plans form the basis for the land use and transportation components of the AQMP, which are used in the preparation of air quality forecasts and in the consistency, analysis included in the AQMP. The Regional Transportation Plan, Regional Transportation Improvement Plan, and AQMP are based on projections originating within the City and County General Plans.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal, the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal outlines more than $638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, Tribal governments, non-profit organizations, businesses and local stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

Most recently, in April 2024, SCAG approved Connect SoCal 2024. Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region's shared goals through 2050. Goals of the plan include more efficient development patterns, reduced congestion, expanded multimodal travel options, and reduced greenhouse gas emission from passenger vehicles. Priority Development Areas are a key focus of the plan to increase development in locations where people can access alternative modes of transportation or make short trips for day-to-day tasks.

Assembly Bill 130/Senate Bill 131

AB 130 and SB 131, signed into effect in June 2025, are intended to streamline CEQA review of new housing development. The bills expanded CEQA exemptions for qualifying housing projects, specifically new infill development. AB 130 also included limitations of local jurisdictions' ability to update building codes to apply more restrictive standards to housing development, including green building standards, effective October 1, 2025, through June 1, 2031.

Local

City of Brea General Plan

Chapter 4 of the currently adopted General Plan, Community Resources, includes the following goals and policies related to air quality:

- **Goal CR-13:** Improve Air Quality
  - **Policy CR-13.1:** Implement City-wide traffic flow improvements.
  - **Policy CR-13.2:** Promote energy conservation and recycling by public and private sectors.
  - **Policy CR-13.3:** Integrate air quality planning with land use, economic development, and transportation planning.
  - **Policy CR-13.4:** Encourage the expansion and retention of local-serving retail businesses (e.g., restaurants, family medical offices, drug stores) to reduce the number and length of automobile trips to comparable services located in other jurisdictions.
  - **Policy CR-13.5:** Encourage alternative modes of transportation, such as walking, biking, and public transportation to reduce emissions associated with automobile use.
  - **Policy CR-13.6:** Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.
  - **Policy CR-13.7:** Work with other responsible Federal, State, and County agencies to decrease air pollution emissions occurring within the air basin.
  - **Policy CR-13.8:** Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

4.2.1.2 Existing Conditions

The following sections summarize meteorological conditions in the Project area, as well as pollutants of concern for this analysis.

Climate

Regional climate and local meteorological conditions influence ambient air quality. The Project area is located in the South Coast Air Basin, where meteorological conditions and topography influence the formation of pollutants, including ozone and fine particulate matter. The basin is subject to weather conditions that delay dispersion, including low wind speed and frequent strong temperature inversions that trap the emissions close to the ground. The mountainous terrain surrounding the South Coast Air Basin further traps pollutants as they are pushed inland with the

sea breeze. The area also experiences a high number of sunny days that increases reactions that form ozone and particulate matter (South Coast AQMD 2022).

Meteorological data for the City is gathered at the Brea station (located at Berry Street and Imperial Highway) (WRCC 2025). The normal daily maximum temperature in the Project area averages 74 degrees Fahrenheit (°F) in August, and the normal daily minimum temperature averages 52°F in December. The normal precipitation in the Project area is approximately 13 inches annually, occurring primarily from November through April.

Air Pollutants and Effects

Historically, air quality laws and regulations have divided air pollutants into two broad categories: criteria air pollutants and TACs. Criteria air pollutants are a group of common air pollutants regulated by the Federal and State governments by means of ambient standards based on criteria regarding health and environmental effects of pollution. TACs are pollutants with the potential to cause significant adverse health effects. Unlike the air quality standards for criterial pollutants to protect health and the environment, in California, the CARB identifies exposure thresholds for TACs that indicate levels below which no significant adverse health effects are anticipated from exposure to the identified substance. However, no thresholds are specified for TACs found to have no safe exposure level or where insufficient data are available to identify an exposure threshold (CARB 2025b).

Criteria Air Pollutants

The criteria air pollutants pertinent to the analysis in this report are CO, nitrogen oxides (NO_X), O_3, particulate matter (PM), and sulfur dioxide (SO_2). The following describes the health effects for each of these criteria air pollutants. Emissions from lead typically result from industrial processes such as ore and metals processing and leaded aviation gasoline (USEPA 2025a). These sources are not proposed as part of the Project; therefore, lead emissions are not included in this analysis.

Carbon Monoxide (CO). CO is a colorless, odorless, poisonous gas produced by combustion processes, primarily mobile sources. When CO gets into the body, it combines with chemicals in the blood and prevents blood from providing oxygen to cells, tissues, and organs. Because the body requires oxygen for energy, high-level exposure to CO can cause serious health effects, including death (USEPA 2025b).

Nitrogen Oxides (NO_X). NO_X is a general term pertaining to compounds including nitric oxide (NO), nitrogen dioxide (NO_2), and other oxides of nitrogen. NO_x is produced from burning fuels, including gasoline, diesel, and coal. NO_X reacts with volatile organic compounds (VOCs) to form ground-level O_3 (also called smog). NO_X is linked to a number of adverse respiratory systems effects (USEPA 2025c).

Ozone (O_3). Ground-level O_3 is not emitted directly into the air but is formed by chemical reactions of "precursor" pollutants (NO_X and VOCs) in the presence of sunlight. Major emissions sources include NO_X and VOC emissions from industrial facilities and electric utilities, motor vehicle exhaust, gasoline vapors, and chemical solvents. O_3 can trigger a variety of health problems, particularly for sensitive receptors, including children, older adults, and people of all ages who have lung diseases, such as asthma (USEPA 2025d).

Particulate Matter (PM_{10} and $PM_{2.5}$). Particulate matter includes dust, metals, organic compounds, and other tiny particles of solid materials that are released into and move around in the air. Particulates are produced by many sources, including the burning of diesel fuels by trucks and buses, industrial processes, and fires. Particulate pollution can cause nose and throat irritation and heart and lung problems. Particulate matter is measured in microns, which are one millionth of a meter in length (or one thousandth of a millimeter). PM_{10} is small (i.e., respirable) particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter (USEPA 2025e).

Sulfur Dioxide (SO_2). SO_2 is formed primarily by the combustion of sulfur-containing fossil fuels, especially at power plants and industrial facilities. SO_2 is linked to a number of adverse effects on the respiratory system (USEPA 2025f).

Existing Air Quality

Ambient air pollutant concentrations in the South Coast Air Basin are measured at air quality monitoring stations operated by CARB and South Coast AQMD. The closest monitoring station to the Project area is the La Habra station located at 621 W. Lambert in La Habra, which measures O_3, and nitrogen dioxide (NO_2). The closest monitoring station that monitors PM_{10} and $PM_{2.5}$ concentrations is the Anaheim-Pampas Lane station located at 1630 West Pampas Lane in Anaheim. Pollutant concentrations are presented in Table 4.2-3, Ambient Air Quality, from 2022 through 2024. Concentrations of one-hour and 8-hour O_3 exceeded the CAAQS in each year. The CAAQS for PM_{10} was exceeded in 2022 and 2023. The monitored 24-hour $PM_{2.5}$ values exceeded the NAAQS in each year. The one-hour CAAQS for NO_2 was not exceeded.

Table 4.2-3. Ambient Air Quality

Pollutant	Standard	2022	2023	2024
O_3[a]				
Maximum 1-hour concentration (ppm)		0.106	0.112	0.146
Number of days exceeded	State: > 0.12 ppm	1	5	6
Maximum 8-hour concentration (ppm)		0.087	0.092	0.094
Number of days exceeded	State: > 0.07 ppm	3	9	11
	Federal: > 0.07 ppm	3	9	11
PM_{10}[b]				
Maximum 24-hour concentration (µg/m³)		66.7	99.4	42.7

Table 4.2-3. Ambient Air Quality

Pollutant	Standard	2022	2023	2024
Number of days exceeded	State: > 50 µg/m^3	1	1	0
	Federal: > 150 µg/m^3	0	0	0
$PM_{2.5}$[b]				
Maximum 24-hour concentration (µg/m^3)		33.1	45.6	49.7
Number of days exceeded	Federal: 35 µg/m^3	1	5	2
Annual arithmetic average concentration (µg/m^3)		9.8	9.1	10.5
Exceeded for the year	State: > 12 µg/m^3	No	No	No
	Federal: > 15 µg/m^3	No	No	No
NO_2[a]				
Maximum 1-hour concentration (ppm)		0.058	0.047	0.056
Number of days exceeded	State: > 0.18 ppm	0	0	0

Source: CARB 2025c

Notes: µg/m^3 = micrograms per cubic meter; ND = no data; NO_2 = nitrogen dioxide; O_3 = ozone; $PM_{2.5}$ = particulate matter smaller than or equal to 2.5 microns in diameter; PM_{10} = particulate matter smaller than or equal to 10 microns in diameter; ppm = parts per million

[a] Monitored at La Habra station.

[b] Monitored at the Anaheim-Pampas station.

Existing operational criteria air pollutant emissions for existing development in the Project area were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.33). Model default assumptions for the existing land use mix were assumed except for the Citywide and BCSP vehicle miles traveled (VMT) data obtained from the Proposed Project-specific Transportation Analysis (Appendix H, Transportation Impact Analysis) prepared by Kittelson & Associates, Inc. (2026). Refer to Table 4.2-4, Existing General Plan Area Emissions, and Table 4.2-5, Existing Brea Core Specific Plan Area Emissions, for calculated existing emissions.

Table 4.2-4. Existing General Plan Area Emissions

Emissions Source	Pollutant (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Hearths	4,270	339	8,313	21	1,167	1,146
Consumer Products	899	—	—	—	—	—
Architectural Coatings	89	—	—	—	—	—
Landscape Equipment	230	17	1821	<1	2	2
Total Area Emissions[a]	5,488	356	10,134	21	1,169	1,148
Energy	11	202	127	1	16	16
Mobile	1,304	755	7,415	16	1,451	375
Total Existing Emissions	6,803	1,313	17,676	38	2,636	1,539

Source: Refer to Appendix D for model output.

Notes: CO = carbon monoxide; NO_X = nitrogen oxides; $PM_{2.5}$ = particulate matter smaller than or equal to 2.5 microns in diameter; PM_{10} = particulate matter smaller than or equal to 10 microns in diameter; VOC = volatile organic compound; SO_X = sulfur oxides

[a] Includes model default assumptions for hearth use

Table 4.2-5. Existing Brea Core Specific Plan Area Emissions

Emissions Source	Pollutant (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Hearths	370	29	721	2	101	99
Consumer Products	139	—	—	—	—	—
Architectural Coatings	15	—	—	—	—	—
Landscape Equipment	44	3	303	<1	<1	<1
Total Area Emissions[a]	568	32	1,024	2	102	100
Energy	1	12	9	<1	1	1
Mobile	247	144	1,407	3	275	71
Total Existing Emissions	816	188	2,440	5	378	172

Source: Refer to Appendix D for model output. Mobile emissions are 23 percent of mobile emissions in Table 4.2-4.

Notes: CO = carbon monoxide; NO_X = nitrogen oxides; $PM_{2.5}$ = particulate matter smaller than or equal to 2.5 microns in diameter; PM_{10} = particulate matter smaller than or equal to 10 microns in diameter; VOC = volatile organic compound; SO_X = sulfur oxides

[a] Includes model default assumptions for hearth use

Toxic Air Contaminants

In addition to criteria air pollutants, both Federal and State air quality regulations also focus on TACs. TACs can be separated into carcinogens and noncarcinogens based on the nature of the effects associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Any exposure to a carcinogen poses some risk of contracting cancer. Noncarcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis. TACs may be emitted by stationary or mobile sources, as described below.

Stationary TAC Sources

Common stationary sources of TAC emissions include gasoline stations, dry cleaners, and diesel backup generators, which are subject to South Coast AQMD permit requirements. These uses are located throughout commercial and retail areas in the Focused GPU and BCSP areas.

Mobile TAC Sources

Motor vehicles on freeways, high-volume roadways, or other areas with high numbers of diesel vehicles, such as distribution centers, are contributors of TAC emissions. Particulate exhaust emissions from diesel-fueled engines known as DPM were identified as a TAC by CARB in 1998. Federal and State efforts to reduce DPM emissions have focused on the use of improved fuels, adding particulate filters to engines, and requiring the production of new technology engines that emit fewer exhaust particulates. Off-road diesel sources, such as construction equipment, are also sources of DPM.

Diesel engines tend to produce a much higher ratio of fine particulates than other types of internal combustion engines. The fine particles that make up DPM tend to penetrate deep into the lungs and the rough surfaces of these particles make it easy for them to bind with other toxins within the exhaust, thus increasing the hazards of particle inhalation. Long-term exposure to DPM is known to lead to chronic, serious health problems including cardiovascular disease, cardiopulmonary disease, and lung cancer. Industrial uses, including distribution facilities, are located primarily in the western portion of the City near Berry Street, and in the southeast along Imperial Highway (State Route 90). State Routes 90, 142, and 57 are major roadways in the Project area.

Sensitive Receptors

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. Sensitive receptors typically include residences, schools, daycare centers, playgrounds, medical facilities, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality (CARB 2005).

Residential areas are considered sensitive to air pollution because residents (including children and older adults) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent as the majority of the workers tend to stay indoors most of the time.

Sensitive receptors are located throughout the City, including the BCSP area. Sensitive receptors primarily consist of residences, but schools, daycare centers, playgrounds, and medical facilities are also located throughout the City.

Odor

Odors are considered an air quality issue both at the local level (e.g., odor from wastewater treatment) and at the regional level (e.g., smoke from wildfires). Odors are generally regarded as an annoyance rather than a health hazard. However, reactions to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Sensitivity to odors varies considerably among the population and is subjective. Several examples of common land use types that generate substantial odors include wastewater treatment plants, landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, autobody shops, and food packaging plants (CARB 2005). The Olinda Alpha

Landfill is located in northeast Brea. Additionally, the City includes existing industrial development and services such as automobile repair that may result in localized odor exposure.

4.2.2 Thresholds of Significance

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

- **Threshold AQ-a:** Conflict with or obstruct implementation of the applicable air quality plan.
- **Threshold AQ-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).
- **Threshold AQ-c:** Expose sensitive receptors to substantial pollutant concentrations.
- **Threshold AQ-d:** Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.2.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and help reduce or avoid potential impacts related to air quality:

PPP AQ-1 **South Coast AQMD Rules.** Development under the Focused General Plan Update and the Brea Core Specific Plan would be required to comply with all applicable South Coast AQMD rules which may include, but are not limited to, the following:

- **Rule 402:** Prohibits a person from discharging 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.
- **Rule 403:** Governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through the application of standard Best Management Practices.
- **Rule 445:** Prohibits permanently installed wood burning devices into any new development.
- **Rule 1108:** Governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule regulates the VOC content of asphalt used during construction.

- **Rule 1113:** Serves to limit the VOC content of architectural coatings used on projects in the South Coast Air Basin. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast Air Basin must comply with the current VOC standards set in this rule.
- **Rule 1303:** Governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM_{10} among other pollutants.
- **Rule 1401:** New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.
- **Rule 2305:** The Warehouse Indirect Source Rule requires owners and operators associated with warehouses 100,000 square feet or larger to directly reduce NO_X and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

PPP AQ-2 Siting of Sensitive Receptors and Toxic Air Contaminant Sources. Development under the Focused General Plan Update and the Brea Core Specific Plan would be required to incorporate land use planning practices consistent with the California Air Resources Board's Air Quality and Land Use Handbook to reduce potential public exposure to toxic air contaminants (TACs).

This would include, but not be limited to, the following:

- Proposed sensitive receptors and facilities that emit TACs would be evaluated for proximity to existing or planned TAC sources, including major roadways, dry-cleaning facilities, gasoline dispensing facilities, automotive repair facilities, commercial or drive-through facilities, and similar uses, using the screening distances identified in the CARB Air Quality and Land Use Handbook.
- Sensitive receptors would include, but not be limited to, daycare centers, schools, hospitals, medical facilities, retirement homes, residential care facilities, and other land uses that may accommodate individuals who are particularly vulnerable to air quality–related health effects.
- Where a proposed sensitive receptor or TAC-emitting facility is located within applicable CARB screening distances of a TAC source or sensitive receptor, discretionary land use review would require preparation of a Health Risk Assessment (HRA), or equivalent health risk evaluation, by a qualified air quality professional, consistent with CARB and applicable local air district guidance.
- The results of an HRA would be used to inform land use planning and discretionary decision-making. Potentially significant health risks would be identified where an

incremental cancer risk greater than 10 in one million or a chronic or acute hazard index greater than 1.0 is predicted.

- Where potentially significant health risks are identified, land use planning and design strategies would be considered to reduce exposure, which may include, but are not limited to, revised site planning, increased separation distances, enhanced building design features (such as sealed ventilation systems with high-efficiency filtration), operational controls, or alternative siting of the sensitive receptor or TAC-emitting use.

4.2.4 Environmental Impacts

The following sections address various potential impacts relating to air quality that could result from implementation of the Proposed Project.

4.2.4.1 Threshold AQ-a: Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis

The South Coast AQMD adopted the 2022 AQMP in December 2022, which builds upon measures already in place from previous AQMPs and continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. The 2022 AQMP incorporates scientific and technological information and planning assumptions, including the Connect SoCal 2020 and updated emission inventory methodologies for various source categories. Criteria for determining consistency with the AQMP are defined in Chapter 12, Sections 12.2 and 12.3, of the South Coast AQMD CEQA Air Quality Handbook. These indicators are discussed below:

Consistency Criterion 1

Consistency Criterion 1 states that a project would result in a potentially significant impact to air quality if it would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. The violations that Consistency Criterion 1 refers to are the California and NAAQS. California and NAAQS violations would occur if regional South Coast AQMD significance thresholds were exceeded.

Focused General Plan Update

As concluded below in Threshold AQ-b, development under the Focused GPU would potentially exceed the applicable regional significance threshold of significance for VOC and NO_X emissions from construction activity, and VOC, PM2.5, and PM10 emissions during operation. Following implementation of Mitigation Measure MM AQ-1, VOC and NO_X emissions would be reduced,

but it cannot be demonstrated that construction of future development would not exceed regional thresholds. Additionally, as discussed under Threshold AQ-b, regulation of VOC emissions from operation is beyond the jurisdiction of the City. Therefore, the Focused GPU would conflict with Consistency Criterion 1.

Brea Core Specific Plan

As concluded below in Threshold AQ-b, the BCSP would not exceed the South Coast AQMD thresholds during construction or operation. Therefore, the BCSP would not conflict with Consistency Criterion 1.

Consistency Criterion 2

Consistency Criterion 2 states that a project would result in a potentially significant impact to air quality if it would exceed the assumptions in the 2022 AQMP at full buildout. The AQMP demonstrates that the applicable ambient air quality standards can be achieved within the time frames required under Federal law. Growth projections from local general plans adopted by cities in the district are provided to SCAG, which develops regional growth forecasts that are then used to develop future air quality forecasts for the AQMP. Typically, development consistent with a local adopted General Plan is considered to be consistent with the AQMP.

Focused General Plan Update

The Focused GPU includes an update to the adopted 2003 General Plan land use plan. The Focused GPU would accommodate additional residential units and non-residential development compared to the 2003 General Plan. The purpose of the Focused GPU is to accommodate projected growth while preserving and enhancing the quality of life for the City's residents. The greatest increase in growth accommodated under the Focused GPU land use mix is in the Mixed Use (MU) land use category. Mixed-use development is consistent with AQMP goals for compact, mixed-use development that reduces vehicle trips and associated vehicle emissions. However, because growth would occur beyond the current air quality forecast for the AQMP, the Focused GPU Update would not be consistent with Consistency Criterion 2.

Brea Core Specific Plan

Similar to the Focused GPU, the BCSP would accommodate additional residential and non-residential development beyond what is currently planned for the area under the 2003 General Plan. Growth would primarily be in the mixed-use category, consistent with regional goals for compact, mixed-use development. However, because growth would occur beyond the current air quality forecast for the AQMP, the BCSP would not be consistent with Consistency Criterion 2.

Summary

The Focused GPU may exceed regional or local significance thresholds for VOC and NO_X during construction, and VOC emissions during construction. Following implementation of Mitigation Measure MM AQ-1, potential impacts from construction would be reduced, but not to a less than significant level. The Focused GPU and BCSP would exceed the growth projections in the 2003 General Plan, and, therefore, the projections of the AQMP. As such, the Focused GPU and BCSP would not be consistent with the AQMP and a potentially significant impact would occur.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measure MM AQ-1 is required.

Level of Significance After Mitigation: Significant and unavoidable.

4.2.4.2 Threshold AQ-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.

Impact Analysis

The South Coast AQMD has established significance thresholds to assess the regional and localized impacts of Proposed Project-related air pollutant emissions. These significance thresholds are updated as needed to appropriately represent the most current technical information and attainment status in the South Coast Air Basin. Table 4.2-6, Maximum Daily Regional Emissions Thresholds of Significance, provides a summary of the South Coast AQMD Regional Emissions Thresholds for both construction and operational activities. The South Coast AQMD's CEQA Air Quality Significance Thresholds indicate that any projects in the South Coast Air Basin with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact (South Coast AQMD 2023).

Table 4.2-6. Maximum Daily Regional Emissions Thresholds of Significance

Pollutant	Pounds per Day	
	Construction Regional Thresholds	Operational Regional Thresholds
NO_X	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550

Source: South Coast AQMD March 2023.

Notes: CO = carbon monoxide; NO_X = oxides of nitrogen; PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; SO_X = sulfur oxides; VOC = volatile organic compounds

Focused General Plan Update

Construction

Construction of future projects under the Focused GPU would result in temporary air pollutants associated with soil disturbance, dust emissions, employee and material delivery vehicle exhaust, off-gassing from paving and coating activities, and combustion pollutants from off-road construction equipment. Construction-related air pollution emissions can vary from day to day, depending on the level of activity, the type of activity, and the prevailing weather conditions. The primary air pollutants of concern from construction activities are particulate matter (including both PM_{10} and $PM_{2.5}$), CO, and O_3 precursors (including VOCs and NO_X) because these are the pollutants for which the South Coast Air Basin is in non-attainment.

Maximum daily construction emissions from Focused GPU buildout were estimated using CalEEMod, version 2022.1.1.33. The Proposed Project is a land use policy plan and does not propose any specific construction projects and the details of future construction under the plan are currently unknown. It was assumed for the purposes of CEQA analysis for the Proposed Project that an equal amount of development would occur each year between the 2025 baseline and 2050 buildout year, and that 10 percent of existing development would be demolished over the same period to accommodate the planned growth. Year 2025 is conservatively assumed for the construction year. Modeling assumes the default number of working days estimated by CalEEMod for all phases except building construction. The building construction phase was reduced to one calendar year. It is assumed the future construction would include site watering twice per day in compliance with South Coast AQMD Rule 403, and low VOC architectural coatings in compliance with South Coast AQMD Rule 1113. Detailed assumptions and modeling datasheets are provided in Appendix D. Estimated maximum daily construction emissions are provided in Table 4.2-7, Estimated Focused GPU Maximum Daily Construction Emissions (pounds/day).

Table 4.2-7. Estimated Focused GPU Maximum Daily Construction Emissions (pounds/day)

Construction Phase	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	3	113	60	1	81	16
Site Preparation	3	29	30	<1	9	5
Grading	3	36	33	<1	7	3
Building Construction	2	14	31	<1	5	2
Paving	1	7	11	<1	1	<1
Architectural Coating	99	1	5	<1	1	<1
South Coast AQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant?	Yes	Yes	No	No	No	No

Sources: Refer to Appendix D for model output.

Notes: Bold text represents emissions exceeding the South Coast AQMD threshold.

South Coast AQMD = South Coast Air Quality Management District; CO = carbon monoxide; NO_X = oxides of nitrogen; PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; SO_X = sulfur oxides; VOC = volatile organic compound

As shown in Table 4.2-7, construction emissions estimates indicate that construction activities for development projects allowed under the Focused GPU would have the potential to result in significant VOC and NO_X emissions during construction. These emissions reflect the assumption of equal amounts of development occurring each year. Because the Proposed Project is a policy plan, and the timing, intensity, and sequencing of actual future construction are unknown, these results serve only as reasonable projections for CEQA analysis. Realistically, construction emissions for all pollutants could be greater or lower depending on how future development in the City ultimately occurs.

Construction of future development consistent with the Focused GPU would have the potential to result in significant criteria air pollutant emissions during construction. Therefore, construction air quality impacts would be potentially significant, and implementation of Mitigation Measure MM AIR-1 that requires site-specific air quality analysis and best management practices during construction activities. These practices would reduce VOC and NO_X emissions. However, because details of future construction (e.g., timing, intensity, duration, equipment) are not yet known, it cannot be demonstrated if impacts would be reduced to below South Coast AQMD levels. Therefore, this impact is considered significant and unavoidable even with incorporation of MM AIR-1.

Operation

Long-term air pollutant emissions impacts are those associated with stationary sources and mobile sources involving any Proposed Project-related changes. Stationary sources of emissions include the use of architectural coatings, consumer products, landscape equipment, and energy use. Area sources of air pollutant emissions associated with future development under the Focused GPU would include fuel combustion emissions from space and water heating, fuel combustion emissions from landscape maintenance equipment, VOC emissions from periodic repainting of interior and exterior surfaces, and natural gas use. Increased traffic volumes also contribute to regional emissions of criteria air pollutants.

The total estimated operational emissions from implementation of the Focused GPU were calculated with CalEEMod using default assumptions for the proposed land use mix, with the exception of wood hearths and stoves. In accordance with South Coast AQMD Rule 445, it is assumed that no new wood hearths or stoves would be installed. Default natural gas stoves and hearths are assumed. Total daily VMT for buildout of the Focused GPU was provided by Kittelson & Associates, Inc. (Appendix H).

Table 4.2-8, Net Change in Focused GPU Operational Emissions, provides calculated operational emissions for buildout of the Focused GPU land uses. Buildout emissions are compared to existing emissions to calculate the net change in maximum daily emissions.

Table 4.2-8. Net Change in Focused GPU Operational Emissions

Source	Air Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Hearths	4,276	443	8,357	22	1,175	1,154
Consumer Products	1,269	—	—	—	—	—
Architectural Coatings	126	—	—	—	—	—
Landscape Equipment	326	23	2,625	<1	3	2
Total Area Emissions	5,997	466	10,982	22	1,178	1,156
Energy	15	269	170	2	21	21
Mobile	877	458	5,659	15	1,753	448
Total Daily Buildout Emissions	6,889	1,193	16,811	39	2,952	1,625
Existing Emissions	*6,803*	*1,313*	*17,676*	*38*	*2,636*	*1,539*
Net Change	86	(−120)	(-865)	1	316	86
South Coast AQMD Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Significant?	Yes	No	No	No	Yes	Yes

Source: Refer to Appendix D for model output.

Notes: South Coast AQMD = South Coast Air Quality Management District; CO = carbon monoxide; NO_X = nitrogen oxides; $PM_{2.5}$ = particulate matter measuring no more than 2.5 microns in diameter; PM_{10} = particulate matter measuring no more than 10 microns in diameter; SO_X = sulfur oxides; VOC = volatile organic compound

As shown in Table 4.2-8, operational emissions for buildout of the Focused GPU would have the potential to exceed the South Coast AQMD threshold for VOC and particulate matter emissions, primarily due to the potential increase in the use of consumer products from increased development, followed by landscape equipment and mobile emissions. Table 4.2-4 details the existing Focused GPU area emissions. Consumer products include various solvents used in non-industrial applications, such as cleaning supplies, kitchen aerosols, cosmetics, and toiletries. Therefore, operational air quality impacts would be potentially significant.

Health impacts of Criteria Air Pollutants

As discussed in Section 4.2.1.2, Existing Conditions, criteria air pollutants have the potential to result in health impacts, such as headaches or throat irritation, at the time of exposure. In December 2018, in the case of Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, the California Supreme Court held that an Environmental Impact Report (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts or meaningfully explain why that analysis cannot be provided.

Consistent with other agencies Statewide, neither the City of Brea nor South Coast AQMD have adopted thresholds related to potential health impacts from criteria air pollutant emissions because individual exposure levels and individual reactions to localized short-term exposure to pollutant emissions from individual project construction and operation cannot be feasibly determined. For example, the localized level of ozone that receptors may be exposed to from VOC emissions cannot

be determined because the formation of ozone is not directly determined by the quantity of VOC and NO_X emissions generated by a project (San Joaquin Valley APCD 2015). The amount of ozone formed depends on heat and sunlight exposure, and once formed, ozone is likely to be dispersed or carried away from the site by wind. Conversely, ozone exposure on site could have been transported to the site by wind and be attributable to another source (USEPA 2025d). Currently, there are no known methods that can feasibly ascertain the ultimate locations of ozone formation associated with the emissions of ozone precursors such as VOC and NO_X (San Joaquin Valley APCD 2015). Additionally, although buildout of the Proposed Project has the potential to exceed South Coast AQMD VOC thresholds from total new growth, the specific distribution of VOC sources is currently unknown. Therefore, localized impacts related to VOCs cannot be determined.

The South Coast AQMD has adopted screening look-up tables, or localized significance thresholds (LSTs) that may be used in determining the significance of an individual project's localized air quality impacts to determine if further detailed analysis is required. Local air emissions from construction and operation of a project may be analyzed using the South Coast AQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by the South Coast AQMD (revised July 2008).The look-up tables were developed by the South Coast AQMD to readily determine if the daily emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ from a project could result in a significant localized impact to the local air quality (SCAQMD 2009). The screening thresholds vary by receptor area and size of the disturbance area, up to 5 acres per day.

As discussed above, construction and operation of development under the Focused GPU would have the potential to exceed the South Coast AQMD mass daily thresholds. Therefore, growth under these plans would have the potential to result in a cumulatively considerable contribution to regional emissions and related health impacts. Because specifics of future projects are unknown, including project sizes or location, it is inappropriate to apply the LSTs at the programmatic level. Future individual projects would need to compare project emissions to the LSTs to determine if a potential localized impact would occur. This impact would be potentially significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM AIR-1 is required for construction impacts, and no feasible mitigation measure is available for operational impacts.

Level of Significance Before Mitigation: Significant and unavoidable.

Brea Core Specific Plan

Construction

Similar to the Focused GPU, construction of future projects under the BCSP would result in temporary air pollutants associated with soil disturbance, dust emissions, employee and material delivery vehicle exhaust, off-gassing from paving and coating activities, and combustion pollutants from off-road construction equipment. Estimated maximum daily construction emissions are provided in Table 4.2-9, Estimated Brea Core Specific Plan Maximum Daily Construction Emissions (pounds/day).

Table 4.2-9. Estimated Brea Core Specific Plan Maximum Daily Construction Emissions (pounds/day)

Construction Phase	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	2	22	20	<1	3	1
Site Preparation	3	29	30	<1	21	11
Grading	2	26	22	<1	11	5
Building Construction	1	11	19	<1	2	1
Paving	1	6	10	<1	1	<1
Architectural Coating	70	1	2	<1	<1	<1
South Coast AQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant?	No	No	No	No	No	No

Sources: Refer to Appendix D for model output.

Notes: South Coast AQMD = South Coast Air Quality Management District; CO = carbon monoxide; NO_X = oxides of nitrogen; PM_{10} = particulate matter less than 10 microns in diameter; $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter; SO_X = sulfur oxides; VOC = volatile organic compound

As shown in Table 4.2-9, construction emissions estimates indicate that development allowed under the BCSP would not result in significant air emissions during individual phases of construction. These results reflect the assumption of equal amounts of development occurring each year. Similar to the Focused GPU, construction emissions for all pollutants may be greater or lower depending on how future development in the BCSP ultimately occurs. However, as shown in Table 4.2-9, calculated emissions for the BCSP area indicated that construction emissions would be below South Coast AQMD thresholds. Therefore, direct impacts from development under the BCSP would be less than significant, and no mitigation measure is required. The BCSP's contribution to Focused GPU emissions is evaluated below in Section 4.2.5.2, Cumulative Threshold AQ-b.

Operation

The total estimated operational emissions for residential and non-residential development accommodated by the BCSP were calculated with CalEEMod using default assumptions, with the exception of residential wood hearths and stoves. In accordance with South Coast AQMD Rule 445, it is assumed that no new wood hearths or stoves would be installed. Default natural gas stoves and

hearths is assumed. Table 4.2-10, Net Change in BCSP Operational Emissions, provides calculated operational emissions for BCSP buildout. Buildout emissions are compared to existing BCSP emissions (refer to Table 4.2-5) to calculate the net change in maximum daily emissions.

Table 4.2-10. Net Change in BCSP Operational Emissions

Source	Air Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Hearths	373	76	741	2	105	103
Consumer Products	234	--	--	--	--	--
Architectural Coatings	24	--	--	--	--	--
Landscape Equipment	69	5	548	<1	1	<1
Total Area Emissions	700	81	1,289	2	106	104
Energy	1	24	14	<1	2	2
Mobile	219	114	1,413	4	438	112
Total Daily Buildout Emissions	920	219	2,716	6	546	218
Existing BCSP Emissions	*816*	*188*	*2,440*	*5*	*378*	*172*
Net Change	104	31	276	1	168	46
South Coast AQMD Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Significant?	Yes	No	No	No	Yes	No

Source: Refer to Appendix D for model output.

Notes: South Coast AQMD = South Coast Air Quality Management District; CO = carbon monoxide; NO_X = nitrogen oxides; $PM_{2.5}$ = particulate matter measuring no more than 2.5 microns in diameter; PM_{10} = particulate matter measuring no more than 10 microns in diameter; SO_X = sulfur oxides; VOC = volatile organic compound

As shown in Table 4.2-10, operational emissions for buildout of the BCSP would have the potential to exceed the South Coast AQMD threshold for VOC and particulate matter emissions, primarily due to the potential increase in the use of hearths and consumer products from increased development, followed by landscape equipment and mobile emissions. Therefore, direct impacts would be potentially significant.

Health impacts of Criteria Air Pollutants

The same discussion from the Focused GPU applies. As with the Focused GPU analysis, because specifics of individual future projects are unknown, including project sizes or location, it is inappropriate to apply the LSTs at the programmatic levels. Future individual projects would need to compare project emissions to the LSTs and project-specific analysis would be required to determine if localized impacts would occur. This impact would be potentially significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: No feasible mitigation measure is available for operational impacts.

Level of Significance After Mitigation: Significant and unavoidable.

4.2.4.3 Threshold AQ-c: Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis

Sensitive receptors include residences, schools, daycare centers, playgrounds, medical facilities, or other facilities that may house individuals with health conditions who are adversely impacted by changes in air quality. The two primary emissions of concern regarding health effects for land development projects are CO hotspots and TACs. An analysis of the potential health impacts from operational emissions is also discussed below.

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Carbon Monoxide Hotspots

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Proposed Project CO levels to the State and Federal CO standards outlined above.

To determine if the Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hotspots" at a number of intersections in the general Project vicinity. Because of reduced speeds and vehicle queuing, "hotspots" potentially can occur at high traffic volume intersections with a Level of Service E or worse. The South Coast AQMD does not have an adopted screening level for a high traffic volume intersection. However, the Bay Area Air District has determined that projects that would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour would result in less than significant impacts related to CO hotspots (BAAD 2022).

Traffic data provided by Kittelson & Associates, Inc. (2025) includes buildout daily traffic volumes on area roadways. The maximum average daily trip (ADT) is 55,493 ADT on Imperial Highway between Berry Street and Brea Boulevard. This segment is located in the BCSP area. Peak hour traffic volumes are typically approximately 10 percent of ADT (Caltrans 2013). As such, peak hourly volumes on the segment with the highest ADT would be approximately 5,549 vehicles and would not result in intersection hourly volumes that exceed 44,000. Buildout of the Focused GPU and BCSP would not result in traffic volumes with the potential to result in CO hotspots.

Potential CO impacts discussed under Threshold AQ-b for the BCSP are primarily related to residential hearths and landscape equipment. Use of hearths and landscape equipment would occur intermittently across the entire BCSP. Unlike intersection emissions, emissions from these sources would not be concentrated in one area, and a hotspot would not occur. Therefore, potential CO impacts would be less than significant.

Toxic Air Contaminants

Construction

The greatest potential for TAC emissions during Proposed Project construction activities under the Focused GPU and BCSP would be related to emissions of DPM associated with heavy equipment operations during site preparation, grading, and utilities construction activities. Construction-related activities would result in short-term emissions of DPM from off-road, heavy-duty diesel equipment exhaust. However, the Focused GPU and the BCSP are both policy documents and specific future construction activities under the Focused GPU and BCSP are currently unknown. Construction activities would be spread throughout the Project area and generally would not take place in a singular location or at the same time.

Generation of DPM from individual construction projects typically occurs in a single area for a short period of time. Health risks are generally evaluated over a 30-year exposure period. The duration of construction activities near any specific sensitive receptor would be temporary and short term. Additionally, with ongoing implementation of CARB requirements for cleaner fuels, off-road diesel engine retrofits, and new, low-emission diesel engine types, the DPM emissions from individual equipment would be substantially reduced over the years as construction continues in accordance with the Focused GPU and BCSP. Additionally, as shown in Table 4.2-7 and Table 4.2-9, emissions of both fugitive dust and exhaust particulate matter combined are anticipated to be below South Coast AQMD thresholds for construction activities anticipated for the representative construction year for both the Focused GPU and BCSP. Therefore, impacts associated with temporary DPM emissions from construction under the Focused GPU and BCSP would be less than significant.

Operation

CARB's Air Quality and Land Use Handbook (CARB 2005) lists several potential sources of substantial DPM emissions, including (1) freeways or urban roads with 100,000 vehicles per day, (2) commercial facilities that require heavy-truck deliveries or include drive-through facilities, (3) extraction operations or cement manufacturing, (4) power plants, (5) recycling and garbage transfer stations, (6) industrial land uses that require heavy-truck trips, (7) farming operations, and (8) dry cleaners using perchloroethylene.

The BCSP area includes existing general industrial land use, and there are also other existing general industrial land uses in the other areas of the Focused GPU area would accommodate additional general industrial land use at buildout. Additionally, sources of other TACs that may be accommodated by the Project in commercial areas include dry-cleaning facilities, gas stations, commercial/drive-through facilities, and automotive repair shops.

Stationary sources of TACs from industrial processes are required to obtain permits to operation from the South Coast AQMD. Specifically, Rule 1303 and Rule 1401 regulate new or relocated emissions sources and put limits on source emissions. New large distribution facilities, or similar facilities with high truck traffic, if ultimately proposed, would be required to comply with South Coast AQMD Rule 2305 to reduce exposure to NO_X particulate matter. All facilities would be required to comply with the CARB Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling to reduce public exposure to DPM and other TACs and their pollutants. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. The measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time. Potential localized air toxic impacts from on-site sources of DPM would be reduced because multiple routes to accommodate heavy-duty trucks are located throughout the City, including accesses to Imperial Highway (State Route 90), and State Routes 142, and 57. As such, truck traffic would be distributed along multiple routes, and the trucks would generally not idle in a single area for extended periods of time. Therefore, an existing regulatory framework is in place to reduce TAC exposure from new industrial land use. New industrial developments, including distribution facilities, would be required to demonstrate consistency with South Coast AQMD emissions limits prior to obtaining permits. However, new sensitive receptors could be proposed in areas with existing industrial land use, or near major roadways. Siting of new sensitive receptors is a potentially significant impact.

Many dry-cleaning facilities use perchloroethylene (Perc), the most common solvent used in the industry. Perc dry cleaners are also required to comply with CARB and South Coast AQMD regulations, but some emissions still occur (CARB 2005). Refueling at gas stations releases benzene, a potent carcinogen, into the air. Automotive repair shops are a source of solvents that are potential TACs. The Air Quality and Land Use Handbook recommends that new sensitive receptors be located more than 300 feet from any dry-cleaning operations, and more the 500 feet from operations using more than one machine. The vast majority of dry cleaners in California have only one machine (CARB 2005). Sensitive land uses should not be sited in the same building as a dry-cleaning facility. These siting distances apply only to facilities where clothes are cleaned. They do not apply to storefronts or other facilities that serve as pick-up or drop-off locations for off-site cleaning facilities. A 50-foot separation between the nearest sensitive receptor and a gas station is recommended for typical gas dispensing facilities, but a separation of 300 feet is recommended for large gas stations with a throughput of 3.6 million gallons per year or greater. The handbook does not recommend a separation distance for automotive repair facilities.

Potential impacts related to TAC exposure are site specific and would need to be addressed on a case-by-case basis. The Focused GP and BCSP include new mixed-use development and new housing opportunities in proximity to employment opportunities. Commercial uses near residential areas could include neighborhood-serving uses such as dry-cleaning facilities, gas stations, and

automotive repair facilities. Therefore, sensitive receptors would potentially be located within proximity to these uses. A potentially significant impact would occur.

Based on CARB's siting recommendations in the Air Quality and Land Use Handbook (CARB 2005), a detailed Health Risk Assessment should be conducted for proposed sensitive receptors within 1,000 feet of a warehouse distribution center, 300 feet of a large gas station, 50 feet of a typical gas dispensing facilities, or 300 feet of a dry-cleaning facility that uses perchloroethylene (i.e., PCE), among other siting recommendations. Because specific Proposed Project details, including location and use, are not currently known at this time, there is a potential for future facilities to expose sensitive receptors to TACs and for new sensitive receptors to be sited within the screening level distance of a source of TACs. However, incorporation of PPP AQ-2 that requires the preparation of a health risk evaluation for the development of new sensitive receptors near sources of TACs or new sources of TACs would ensure that impacts to new sensitive receptors are less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation is required.

4.2.4.4 Threshold AQ-d: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Impact Analysis

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Construction

Construction associated with implementation of the Project could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. However, because the construction equipment would be operating at various locations throughout the Project area, and construction would not take place all at once, individual receptors would be exposed to minimal construction odor at any given time. Additionally, SO_X is the only criteria air pollutant with a strong, pungent odor (ATSDR 2015). As shown in Table 4.2-7 and Table 4.2-9, construction emissions of SO_X are not anticipated to exceed 1 pound per day during typical construction activities, which is well below the South Coast AQMD threshold of 150 pounds per day. As such, impacts associated with odors during construction would be less than significant.

Operation

CARB's Air Quality and Land Use Handbook includes a list of the most common sources of odor complaints received by local air districts. Typical sources of odor complaints include facilities such as sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, coating operations, fiberglass manufacturing, foundries, rendering plants, and

livestock operations. The allowed uses in the Focused GPU and BCSP would include commercial, retail, office, and residential land uses. Oil fields and other petroleum-related facilities currently operate in the City. The Focused GPU would continue to require all oil fields and related operations to comply with all current regulations. Any potential future odor sources, such as new industrial or petroleum-related uses, would be subject to South Coast AQMD Rule 402 to prevent occurrences of public nuisances. The Focused GPU does not include any change to Olinda Alpha Landfill operation. Therefore, Project operations 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.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.2.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to air quality that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same. Air quality impacts are not confined to jurisdictional boundaries. Therefore, cumulative impacts are evaluated using the AQMP, which is based on regional growth projections provided by SCAG.

4.2.5.1 Cumulative Threshold AQ-a: Conflict with or obstruct implementation of the applicable air quality plan.

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The AQMP is a cumulative plan for achieving ambient air quality standards in the South Coast Air Basin. As previously discussed, CARB designates the South Coast Air Basin as non-attainment for ozone, PM_{10}, and $PM_{2.5}$ under CAAQS while the USEPA designates the South Coast Air Basin as non-attainment for ozone and $PM_{2.5}$ under the NAAQS. The AQMP is based on growth projections provided by SCAG. If projects are determined to be consistent with zoning/land use designations for the site, and would not exceed the South Coast AQMD regional significance thresholds, then cumulative projects would not have a cumulative impact. As indicated under the analysis of Section 4.2.4.1, implementation of the Focused GPU and BCSP may result in violation of regional significance thresholds for VOC and particulate matter, and the Focused GPU may also exceed the threshold for NOx during construction. Additionally, the Focused GPU and BCSP would accommodate growth beyond the current assumptions incorporated into the AQMP. As such, the Project would result in a potential conflict with the South Coast AQMD 2022 AQMP

and impacts would be cumulatively considerable. As discussed under Threshold AQ-a, Mitigation Measure MM AQ-1 would reduce construction emissions, but mitigation is not available to reduce construction or operation emissions to below the air quality significance thresholds, and reducing growth assumptions consistent with the AQMP would not be consistent with Proposed Project objectives. This impact would be cumulatively considerable and unavoidable.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM AQ-1 is required.

Level of Significance Before Mitigation: Significant and unavoidable.

4.2.5.2 Cumulative Threshold AQ-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).

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

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

Therefore, this analysis assumes that individual projects that exceed the South Coast AQMD's recommended daily thresholds of significance for project-specific impacts would result in a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air

Basin is in non-attainment. As discussed under Section 4.2.4.2, implementation the Focused GPU would result in a significant cumulative impact during construction and operation, and the BCSP would result in a significant cumulative impact during operation. The BCSP alone would not exceed South Coast AQMD thresholds during construction, but would contribute to total Focused GPU emissions. As such, the BCSP would also result in a cumulatively considerable contribution to the Focused GPU cumulative impact for construction. Mitigation Measure MM AQ-1 would reduce construction emissions, but it cannot be demonstrated that emissions would be reduced to a less than significant level. Additionally, it is beyond the control of the City to regulate operational emissions to below thresholds during construction. This impact would be cumulatively considerable and unavoidable.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM AQ-1 is required.

Level of Significance Before Mitigation: Significant and unavoidable.

4.2.5.3 Cumulative Threshold AQ-c: Expose sensitive receptors to substantial pollutant concentrations.

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Cumulative growth in the Focused GPU and BCSP areas would have the potential to increase congestion and potentially result in CO hotspots. However, as described previously, the increase in vehicle trips associated with the implementation of the Project would not generate traffic volumes that would result in a CO hotspot at any intersection. Therefore, a significant cumulative impact related to CO hotspots would not occur.

The cumulative projects located in the South Coast Air Basin would also have the potential to result in a significant cumulative impact associated with sensitive receptors if, in combination, they would expose sensitive receptors to a substantial concentration of TACs that would significantly increase health risks. Impacts would generally be localized and not cumulative in nature because impacts related to a particular source of TACs would be limited to the proximity of the source. Cumulative projects with the potential to generate substantial pollutant concentrations would be required to comply with South Coast AQMD and CARB programs to reduce emissions in accordance with permitting requirements. In addition, PPP AQ-2 would be implemented to limit the siting of new sensitive receptors near existing sources of TACs in the City. It is assumed that projects in adjacent jurisdictions would be required to demonstrate similar land use compatibility during the project approval process. Therefore, the Project, in combination with other cumulative projects in the region, would not result in a cumulatively considerable contribution associated with impacts to sensitive receptors.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation is required.

4.2.5.4 Cumulative Threshold AQ-d: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Focused General Plan Update and Brea Core Specific Plan

Impacts relative to objectionable odors are limited to the area immediately surrounding the odor source and are not cumulative in nature because the air emissions that cause odors disperse beyond the sources of the odor. As the emissions disperse, the odor becomes decreasingly detectable. Construction of cumulative projects would have the potential to occur simultaneously throughout the Project area. Construction-related odors would include construction equipment exhaust and the application of asphalt and architectural coatings. However, generators of odors in any one area would be temporary, short term, and intermittent in nature, and odors from multiple construction sites would be unlikely to combine to contribute to any cumulatively considerable odor impacts in the local area. Cumulative projects would also be subject to South Coast AQMD rules to limit nuisance odors during operation. Thus, Project-related odor impacts in combination with other cumulative projects would be less-than-cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.2.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds AQ-c and AQ-d would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP AQ-1, PPP AQ-2, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050: General Plan Goals, Policies, and Actions).

Without mitigation, environmental impacts related to Thresholds AQ-a and AQ-b would be potentially significant.

4.2.7 Mitigation Measures

MM AQ-1 Site-Specific Air Quality Analysis and Best Management Practices. Prior to the issuance of a grading or construction permit for individual development projects that are not exempt from California Environmental Quality Act (CEQA), and in conjunction with any required CEQA review, future project applicants shall submit to the City of Brea Planning Division documentation that the project is consistent with the South Coast Air Quality Management District (South Coast AQMD) mass daily significance thresholds and localized significance thresholds (LSTs) for criteria air pollutant emissions during

construction. A project-specific Air Quality Analysis quantifying the potential air emissions of project construction shall be prepared by a qualified air quality professional. This Air Quality Analysis shall demonstrate that criteria air pollutant emissions are below the South Coast AQMD mass daily significance thresholds and LSTs. If the Air Quality Analysis cannot demonstrate that the project is below the South Coast AQMD thresholds before mitigation, the project applicant shall implement practices to reduce VOC and NO_X emissions to the extent necessary to reduce emissions to below South Coast AQMD thresholds. Best management practices may include, but are not limited to:

- Use equipment with engines that meet, at a minimum, the Tier 4 Final California Emissions Standards, or electric-powered equipment.
- Use architectural coatings that meet "Super-Compliant" VOC standards (as defined in South Coast AQMD Rule 1113) and California Green Building Standards Code (CALGreen) requirements under the mandatory measures, or pre-coated materials such as bathroom stall dividers, and metal awnings.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site and at construction offices/trailers.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

The project applicant shall provide documentation to the City of Brea detailing the measures that would be implemented and that mitigated emissions would be below South Coast AQMD thresholds. Measures shall be included in project construction documents, and contractors and subcontractors shall implement the applicable South Coast AQMD measures.

4.2.8 Level of Significance After Mitigation

Threshold AQ-a: Conflict with or obstruct implementation of the applicable air quality plan.

Focused General Plan Update and Brea Core Specific Plan

The Focused GPU and BCSP would have the potential to exceed AQMP growth assumptions, and may result in violation of regional and local significance thresholds during construction and operation. Mitigation Measure MM AQ-1 would reduce impacts related to construction emissions, but not to below a level of significance. Construction and operation emissions would have the potential to exceed regional significance thresholds, and buildout growth under the Focused GPU and BCSP would exceed AQMP growth assumptions.

As discussed below under Threshold AQ-b discussion, feasible mitigation is not available to reduce construction or operation emissions to a less than significant level. It is anticipated that a future update to the South Coast AQMD AQMP would incorporate updated growth assumptions for the South Coast Air Basin, including growth consistent with the buildout of the Focused GPU and BCSP. However, South Coast AQMD planning and updates to the AQMP are beyond the control of the City. Therefore, this impact would remain significant and unavoidable.

Threshold AQ-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).

Focused General Plan Update and Brea Core Specific Plan

The Project may result in a cumulatively considerable net increase of criteria air pollutants for which the South Coast Air Basin is in non-attainment under an applicable Federal or State ambient air quality standard. Specifically, the Focused GPU may result in violation of regional significance thresholds for VOC and NO_X during construction, including cumulative growth from the BCSP. Mitigation Measure MM AQ-1 would reduce impacts related to construction emissions, but not to below a level of significance. Although MM AQ-1 would reduce VOC and NO_X emissions, because details of future construction are not yet known, it cannot be demonstrated if impacts would be reduced to below South Coast AQMD threshold levels. Therefore, construction air quality impacts would remain significant and unavoidable.

The Focused GPU and BCSP would have the potential to exceed VOC and particulate matter thresholds during operation. Feasible mitigation is not available to reduce operational emissions to below a level of significance. During operation, potentially significant impacts related to VOC and particulate matter emissions from the increase in area sources are primarily due to consumer products, but also including landscape equipment, hearths, and mobile emissions. The VOC content of consumer products and architectural coatings, and landscape emissions standards, are beyond the control of the City. It is also beyond the scope of the Project for mitigation to control consumers' choices in available products.

VOC and $PM_{2.5}$ emissions could also be reduced through limiting future natural gas use in buildings, including all-electric development or a ban on new natural gas hearths. However, requirements that limit natural gas use in residential development would conflict with AB 130, which limits the ability of local agencies to enact more restrictive standards for residential development. As such, mitigation measures to control emissions from these sources are not feasible.

As discussed in Section 4.2.1.1, the South Coast AQMD has updated VOC content limits for architectural coating over time to be increasingly more stringent. Similarly, CARB establishes and periodically updates VOC limits for various consumer products. CARB also regulates small off-road engines, such as landscaping equipment, and vehicle emissions and standards are anticipated

to become more stringent over time, and as older vehicles are retired. Emissions standards have increased over time, and CARB is currently considering more stringent emissions standards and incentives to increase zero emissions equipment use (CARB 2025d). South Coast AQMD also has two ongoing incentive programs (for commercial and residential users) to replace fuel powered landscape equipment with battery-operated equipment (South Coast AQMD 2025). As such, South Coast AQMD and CARB efforts would likely reduce project VOC, PM_{10}, and $PM_{2.5}$ emissions over time. Additionally, despite AB 130 limitations at the local level, all-electric development remains a Statewide goal. Incentive programs are currently available, such as the California Electric Homes Program, that provide incentives for new all-electric home construction (CEC 2025). The number of natural gas hearths assumed in the air quality modeling is likely conservative, and reduced natural gas use would reduce VOC, PM_{10}, and $PM_{2.5}$ emissions compared to calculated emissions in Table 4.2-8 and Table 4.2-10. However, because these changes to emissions standards and program participation are beyond the control of the City, and because the Project is a policy plan and specifics of future development are unknown at this phase of the plan, it cannot be demonstrated that VOC, PM_{10}, or $PM_{2.5}$ emissions would be reduced to a less than significant level. This operational impact would remain significant and unavoidable.

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4.3 Biological Resources

This section evaluates the potential for impacts on biological resources resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.3.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to biological resources.

4.3.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address biological resources.

Federal

Endangered Species Act (U.S. Code, Title 16, Sections 1531–1543)

The Federal Endangered Species Act (FESA) of 1973, as amended, protects and conserves any species of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found. "Take" of endangered species is prohibited under Section 9 of the FESA. "Take" means to "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Section 7 of the FESA requires Federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) on proposed Federal actions that may affect any endangered, threatened, or proposed (for listing) species or critical habitat that may support the species. Section 4(a) of the FESA requires that critical habitat be designated by the USFWS "to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened." This provides guidance for planners/managers and biologists by indicating locations of suitable habitat and where preservation of a particular species has high priority. Section 10 of the FESA provides the regulatory mechanism for incidental take of a listed species by private interests and non-Federal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits to minimize impacts to the species and formulate viable mitigation measures.

Migratory Bird Treaty Act (U.S. Code, Title 16, Sections 703–712)

All migratory bird species that are native to the United States or its territories are protected under the Federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (Senate Bill [SB] 2547). It prohibits the direct or indirect take of migratory birds and their active nests unless permitted. The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required.

Bald and Golden Eagle Protection Act (16 USC 668–668d)

This act prohibits the possession, selling, or hunting of bald or golden eagles. This includes living eagles and their feathers, nests, eggs, or body parts.

Clean Water Act (U.S. Code, Title 33, Sections 1251–1376)

The Federal Clean Water Act (CWA) provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 requires a project proponent to obtain a Federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain State certification, thereby ensuring that the discharge will comply with provisions of the CWA. The State Water Resources Control Board (SWRCB) administers the certification program in California. Section 402 establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Section 404 establishes a permit program administered by the U.S. Army Corps of Engineers (USACE) that regulates the discharge of dredged or fill material into waters of the United States, including wetlands.

These provisions regulate the discharge of dredged or fill material in waters of the U.S, including wetlands. Activities that discharge dredge or fill material into waters of the U.S. can be authorized by the USACE.

On August 29, 2023, the U.S. Environmental Protection Agency and the USACE issued a final rule to amend the final "Revised Definition of Waters of the U.S." The 2023 final rule became effective on September 8, 2023. Under the 2023 final rule:

(a) Waters of the U.S. are defined as:
1. Waters which are:
    i. Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
    ii. The territorial seas; or
    iii. Interstate waters;
2. Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under (a)(5) of this section;
3. Tributaries of waters identified in (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

4. Wetlands adjacent to the following waters:
    i. Waters identified in (a)(1) of this section; or
    ii. Relatively permanent, standing or continuously flowing bodies of water identified in (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;
    iii. Intrastate lakes and ponds not identified in (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in (a)(1) or (a)(3) of this section.

Wetlands and Other Waters of the United States

Aquatic resources, including riparian areas, wetlands, and certain aquatic vegetation communities, are considered sensitive biological resources and can fall under the jurisdiction of several regulatory agencies. In accordance with the Navigable Waters Protection Rule, effective June 22, 2020, the USACE exerts jurisdiction over waters of the United States, including the territorial seas and traditional navigable waters; perennial and intermittent tributaries that contribute surface water flow to such waters; certain lakes, ponds, and impoundments of jurisdictional waters; and wetlands adjacent to other jurisdictional waters (33 CFR Part 328; 40 CFR Parts 110, 112, 116, 117, 120, 122, 230, 300, 302, and 401).

State

Birds of Prey Protection Provision (California Fish and Game Code, Section 3503.5)

This provision prohibits the taking of birds of prey (Order Falconiformes and Strigiformes), including their nests and eggs.

California Endangered Species Act (California Fish and Game Code, Section 2050 et seq.)

The California Endangered Species Act (CESA) establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that State agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. There are no State agency consultation procedures under CESA. For projects that would affect a listed species under both CESA and FESA, compliance with FESA would satisfy CESA if the California Department of Fish and Wildlife (CDFW) determines that the Federal incidental take authorization is consistent with CESA under the California Fish and Game (CFG) Code, Section 2080.1. For projects that would result in take of a species only listed under CESA, the project proponent must apply for a take permit under Section 2081(b).

California Environmental Quality Act Guidelines, Section 15380(b)

Although threatened and endangered species are protected by specific Federal and State statutes, California Environmental Quality Act (CEQA) Guidelines, Section 15380(b), provides that a species not listed on the Federal or State list of protected species may be considered rare or endangered if

the species can be shown to meet certain specified criteria. These criteria have been modeled after the rare or endangered species definition in FESA and Sections 2050 through 2059.26 of the CFG Code dealing with rare or endangered plants and wildlife. This section was included in CEQA primarily to deal with situations in which a public agency is reviewing a project that may have a significant effect on, for example, a candidate species that has not been listed by either the USFWS or CDFW. Thus, CEQA provides an agency with the ability to protect a species from the potential impacts of a project until the respective government agencies have an opportunity to designate the species as protected, if warranted. CEQA also calls for the protection of other locally or regionally significant resources, including natural communities. Although natural communities do not currently have legal protection of any kind, CEQA calls for an assessment of whether any such resources would be affected and requires findings of significance if there would be substantial losses. Natural communities listed as sensitive by the California Natural Diversity Database (CNDDB) are considered by the CDFW to be significant resources and fall under the CEQA Guidelines to address impacts. Local planning documents, such as General Plans, often identify these resources as well.

California Fish and Game Code, Section 1602

Under this section of the CFG Code, the project proponent is required to notify the CDFW before the start of any project that would divert, obstruct, or change the natural flow, bed, channel, or bank of any river, stream, or lake. Pursuant to the CFG Code, a "stream" is defined as a body of water that flows at least periodically, or intermittently, through a bed or channel that has banks and supports fish or other aquatic life. Based on this definition, a watercourse with surface or subsurface flows that supports or has supported riparian vegetation is a stream and is subject to CDFW jurisdiction. Altered or artificial watercourses valuable to fish and wildlife are subject to CDFW jurisdiction. The CDFW also has jurisdiction over dry washes that carry water during storm events.

Preliminary notification and project review generally occur during the environmental process. When an existing fish or wildlife resource may be substantially adversely affected, the CDFW is required to propose reasonable project changes to protect the resource. These modifications are formalized in a streambed alteration agreement, which becomes part of the plans, specifications, and bid documents for a project.

California Fish and Game Code, Sections 2080 and 2081

Section 2080 of the CFG Code states that "no person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission [CFG Commission] determines to be an endangered species or threatened species, or attempt any of those acts, except as otherwise provided in this chapter, or the Native Plant Protection Act, or the California Desert Native Plants Act." Pursuant to Section 2081 of the CFG Code, the CDFW may authorize individuals or public agencies to import, export, take, or possess State-listed endangered, threatened, or candidate species. These otherwise prohibited acts may be

authorized through permits or Memoranda of Understanding if the take is incidental to an otherwise lawful activity, the impacts of the authorized take are minimized and fully mitigated, the permit is consistent with any regulations adopted pursuant to any recovery plan for the species, and the project operator ensures adequate funding to implement the measures required by the CDFW.

California Fish and Game Code, Sections 3503, 3503.5, 3513, and 3800

Section 3503 of the CFG Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptor (i.e., species in the orders Falconiformes and Strigiformes), including nests or eggs. Typical violations of the CFG Code include destruction of active nests resulting from removal of vegetation in which the nests are located. Violation of Section 3503.5 could also include failure of active raptor nests resulting from disturbance of nesting pairs by nearby project construction. This statute does not provide for the issuance of any type of incidental take permit.

Section 3513 of the CFG Code upholds the MBTA by prohibiting any take or possession of birds that are designated by the MBTA as migratory nongame birds except as allowed by Federal rules and regulations promulgated pursuant to the MBTA.

Section 3800 of the CFG Code affords protection to nongame birds, which are birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds.

California Fish and Game Code, Sections 3511, 4700, 5050, and 5515

California fully protected species are described in Sections 3511, 4700, 5050, and 5515 of the CFG Code. These statutes prohibit take or possession of fully protected species. The CDFW is unable to authorize incidental take of fully protected species when activities are proposed in areas inhabited by those species.

California Wetland Definition

Unlike the Federal government, California has adopted the Cowardin et al. (1992) definition of "wetlands." For this classification, wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes (at least 50 percent of the aerial vegetative cover); (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is non-soil and saturated with water or covered by shallow water at some time during the growing season of each year.

Under normal circumstances, the Federal definition of wetlands requires all three wetland identification parameters to be met, whereas the Cowardin et al. (1992) definition requires the presence of at least one of these parameters. For this reason, identification of wetlands by State agencies consists of the union of all areas that are periodically inundated or saturated or in which at least seasonal dominance by hydrophytes may be documented or in which hydric soils are present.

Natural Communities Conservation Planning Act (California Fish and Game Code, Section 2800)

The Natural Communities Conservation Planning (NCCP) program is a cooperative effort to protect habitats and species. It began under the State's NCCP Act of 1991 and is broader in its orientation and objectives than CESA or FESA. These laws are designed to identify and protect individual species that have already declined significantly in number. The primary objective of the NCCP program is to conserve natural communities at the ecosystem level while accommodating compatible land use. The program seeks to anticipate and prevent the controversies and gridlock caused by species' listings by focusing on the long-term stability of wildlife and plant communities and including key interests in the process.

This voluntary program allows the State to enter into planning agreements with landowners, local governments, and other stakeholders to prepare plans that identify the most important areas for a threatened or endangered species and the areas that may be less important. These NCCP Plans may become the basis for a State permit to take threatened and endangered species in exchange for conserving their habitat. The CDFW and USFWS worked to combine the NCCP program with the Federal Habitat Conservation Plan process to provide take permits for State and Federally listed species. Under the NCCP Act, local governments can take the lead in developing these NCCP Plans and become the recipients of State and Federal take permits.

Native Plant Protection Act (California Fish and Game Code, Sections 1900–1913)

California's Native Plant Protection Act requires State agencies to use their authority to carry out programs to conserve endangered and rare native plants. Provisions of the act prohibit the take of listed plants from the wild and require notification to the CDFW at least 10 days in advance of any change in land use. This allows the CDFW to salvage listed plant species that would otherwise be destroyed. The project proponent is required to conduct botanical inventories and consult with the CDFW during project planning to comply with the provisions of the act and sections of CEQA that apply to rare or endangered plants.

Porter-Cologne Water Quality Control Act (California Water Code, Division 7)

The SWRCB works in coordination with the nine Regional Water Quality Control Boards (RWQCBs) to preserve, protect, enhance, and restore water quality. Each RWQCB makes decisions related to water quality for its region and may approve, with or without conditions, or deny projects that could affect waters of the State. Their authority comes from the CWA and the State's Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The Porter-Cologne Act broadly defines "waters of the State" as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]).

Under the Porter-Cologne Act, the SWRCB and the nine RWQCBs also have the responsibility of granting CWA National Pollutant Discharge Elimination System permits and waste discharge requirements for point-source and nonpoint-source discharges to waters. These regulations limit impacts on aquatic and riparian habitats from a variety of urban sources.

Streambed Alteration Agreement (California Fish and Game Code, Section 1600)

The California Fish and Game Code (CFGC) requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake, or their tributaries, or use materials from a streambed to submit a notification for a Streambed Alteration Agreement to the CDFW.

Local

The Proposed Project area is in the incorporated boundaries of the City of Brea with its Sphere of Influence (SOI) located in unincorporated County of Orange, and the SOI portion is under the County of Orange jurisdiction until annexed into the City.

Orange County General Plan

Approximately 6,232.9 acres of the Project area are located within unincorporated Orange County and outside the City's incorporated limits. Land use and development within these areas are regulated by the Orange County General Plan, which establishes policies for land use, resource management, circulation, and public services under the County's jurisdiction. Inclusion of the County's planning framework also supports analysis of potential land use compatibility issues, regional coordination, and future annexation considerations within the City's SOI.

Land Use Element

The Land Use Element designates an Open Space and Open Space Reserve land use categories to support the open space and natural resource plans contained within the Resources Element and establishes standards for typical intensity, population density, characteristics, and uses of these land categories. The Land Use Element identifies major parks, beaches, forests, harbors, and other territory that will always remain open space, including urban regional parks, wilderness regional parks, and County wilderness areas. The Land Use Element achieves internal consistency with all other General Plan elements by incorporating and implementing their land use concerns and recommendations, including the CONCCP/HCP.

Resources Element

The Resources Element contains official County policies on the conservation and management of resources, including natural and water resources. The Natural Resources Component of the Resources Element contains policies and programs which are designed to protect and conserve these areas. The Resources Element outlined Goals and Objectives to managing resources, including:

- **Goal 1:** Protect wildlife and vegetation resources and promote development that preserves these resources.
  - **Objective 1.1.** To prevent the elimination of significant wildlife and vegetation through resource inventory and management strategies.

Programs included in the Resource Element to achieve these goals and objectives include:

- The County's Oak Resources Management Program, which seeks to preserve oak woodland areas through regional park and open space acquisitions.
- The CONCCP/HCP, which seeks to conserve coastal sage scrub and other Covered Habitats and Identified Species.

The Resource Element also includes an Open Space Component that defines goals, objectives, policies, and programs to promote the preservation and protection of resource areas.

Orange County Code

The Orange County Code establishes countywide regulations related to land use–adjacent functions, including flood control, waste management, environmental health, public safety, and infrastructure systems that extend across City boundaries. The County of Orange retains jurisdiction over certain regional facilities and unincorporated areas within and adjacent to Brea's SOI, of which approximately 6,232.9 acres of the Proposed Project area reside in. County ordinances also implement State mandates related to public health, hazard mitigation, and environmental protection that apply irrespective of City boundaries.

2003 Brea General Plan

The 2003 Brea General Plan's Community Resources Element has goals and policies that pertain to protecting biological resources.

- **Goal CR-4:** Preserve open space aggressively for diverse purposes—as a visual and scenic resource, for habitat conservation, to protect watersheds, and for recreation.
  - **Policy CR-4.1.** Protect and preserve open space wherever possible.
  - **Policy CR-4.2.** Select areas for open space preservation using an evaluation system that incorporates the following selection criteria: connectivity, access/recreations, sensitive areas, natural features, subdivision pattern, and buffer zones.
  - **Policy CR-4.3.** Work aggressively with the Orange County, Los Angeles County, State, and other appropriate public agencies, private entities, and landowners to conserve, protect, and enhance open spaces and natural resources, particularly within the sphere of influence.
- **Goal CR-8:** Preserve and maintain wildlife and animal movement corridors.
  - **Policy CR-8.1.** Preserve key wildlife migration corridors and habitat areas.
  - **Policy CR-8.2.** Provide adequate wildlife crossings where roadways have severed habitat areas.

  - **Policy CR-8.3.** Cooperate with regional agencies and authorities with similar goals in protecting and enhancing wildlife and animal movement corridors.
  - **Policy CR-8.4.** Regular monitoring of medium and large mammals is necessary to gauge the effective ness of wildlife corridors and to identify or increases in wildlife populations.

- **Goal CR-9:** Preserve and maintain open space, natural habitat, and vegetation communities that support wildlife species and animals.
  - **Policy CR-9.1.** Support regional and sub-regional efforts to acquire, develop, operate, and maintain an open space system extending from the Puente Hills to the Chino Hills.
  - **Policy CR-9.2.** Preserve the integrity of blue line streams and riparian habitat areas.
  - **Policy CR-9.3.** Preserve and restore the habitat value of creek corridors though the preservation of native plants and the replacement of invasive, non-native plants with native plants.
  - **Policy CR-9.4.** Protect sensitive plant species resources from the impacts of development.
  - **Policy CR-9.5.** Manage areas of diverse wildlife habitat as a natural resource and prevent major destruction or disruption.
  - **Policy CR-9.6.** Use specific management programs using sound ecological principles and professionally accepted methods are necessary to protect and restore sensitive animal populations and their habitats.

Brea City Code

The Brea City Code (BCC) identifies land use categories, development standards, and other provisions for development projects in the City.

BCC Section 20.206 provides provisions for development in the Hillside Residential (HR) zone. This section applies to all properties within the incorporated boundaries of the City, City's SOI that are designated Hillside Residential on the City's General Plan Land Use Map, and which lie within the Hillside Residential (HR) zoning district. The set of hillside development standards are aimed at protecting the public health, safety and welfare; protecting and preserving natural and biological resources for the long-term benefit of the Brea community and the broader community; recognizing the inherent value in the properties; allowing size, type, location, density, and intensity of development based on available infrastructure, the geographic steepness of terrain, presence of unique geographic conditions and constraints, and presence of environmentally sensitive areas; and optimizing the use of sensitive site design, grading, landscape architecture, and architecture, all to achieve the City's objectives. The provisions include, but are not limited to, open space requirements and landscape requirements, including tree removal and replacement standards.

BCC Chapter 20.74, Tree Preservation, acknowledges that certain native trees are important ecological and aesthetic resources that improves the quality of life for the City's residents, visitors and wildlife and to ensure preservation or propagation of such trees. This BCC chapter applies to any parcel that contains any commercial use (excluding home occupations), any commercially zoned parcels, and any parcel or any combination of parcels within a project site that are equal or greater than 20,000 square feet located within City limits. Table 20.73.020.A of the Chapter provides protected tree types and criteria. The protected trees are all *Quercus* varieties (Oak), all *Salix varieties* (Willow), all *Platanus varieties* (Sycamore), *Hesperocyparis forbesii* (Tecate Cypress), *Juglans californica* (southern California black walnut), *Populus trichocarpa* (Black Cottonwood), *Populus fremontii* (Fremont Cottonwood), and *Alnus rhombifolia* (White Alder) that meets the stated minimum diameter at breast height.

BCC Section 18.24.190 pertaining to subdivisions provides requirements for street trees and landscaping along all streets and highways.

Chapter 12.20 of the BCC also provides provisions for street trees, including the maintenance and removal of street trees.

4.3.1.2 Existing Conditions

Methodology

Biological resources documented as present or with potential to occur in the Proposed Project area were identified through a review of existing maps, literature and other biological studies conducted in the area, and sensitive species occurrence databases by the biological consultant. No biological survey, field reconnaissance, aquatic resources delineation, or focused species surveys were conducted as a part of the Proposed Project's Biological Resources Technical Report (BRTR) (Appendix E of this Program Environmental Impact Report [PEIR]). The results of the review provide information on the potential constraints to project development due to the presence of sensitive biological resources. The potential presence of critical habitat in the Proposed Project area was also analyzed.

For the purposes of this analysis, sensitive biological resources are those defined as follows: (1) species designated as endangered, threatened, rare, protected, sensitive, or species of special concern according to the USFWS, CDFW, California Native Plant Society (CNPS), or applicable regional plans, policies, or regulations needs due to limited distribution, limited numbers, or significant population declines associated with natural or human-made causes; (2) species and habitat types recognized by local and regional resource agencies as special status; (3) habitats or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; or are identified as sensitive in regional or local plans, policies, or regulations, or by the USFWS or CDFW (4) wildlife corridors and habitat linkages; or (5) biological resources that may or may not be considered special status but are regulated under local, State, or Federal laws.

Literature Review

The following documents and databases were reviewed

- Calflora Database (Calflora 2025)
- Consortium of California Herbaria database (CCH 2025)
- The CNPS Rare Plant Program Inventory of Rare Plants (CNPS 2025)
- California Natural Diversity Database (CDFW 2025a)
- CDFW Biogeographic Information and Observation System (CDFW 2025b)
- U.S. Department of Agriculture Soil Survey (USDA 2019)
- USFWS Information for Planning and Consultation (IPaC) (USFWS 2025b)
- USFWS NWI Wetlands Mapper (USFWS 2025a)
- USGS National Hydrography Dataset (NHD) (USGS 2025)

Vegetation Mapping

Vegetation community boundaries for the Proposed Project area were obtained in geographic information system (GIS) format from the CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2025b). Approximately 21 acres of Project area was not mapped in the BIOS database and was extrapolated based on aerial imagery.

Focused General Plan Update

The Proposed Project area is largely developed, and contains various residential, commercial, and industrial development. Various parks/recreation spaces are scattered throughout the Proposed Project area, and large areas of open space occur in the hills to the east of Valencia Avenue (SR-142). Other uses include cemetery, public facilities, and mixed use.

Topography

Topographically, the Proposed Project area is bounded to the north and east by the lower Transverse Ranges, near the boundary of eastern Los Angeles County. The northern and eastern portions of the City generally contain gently to moderately steep slopes and ridges, and the unincorporated SOI area contains primarily steep slopes and ridges. To the south and west, within the City, the topography is generally flat, forming part of the Coastal Plain of Orange County. Topographic maps of the Proposed Project area are included on Figures 3a through 3e, USGS Topographic Map, of the BRTR (Appendix E to this PEIR). Elevation in the City ranges from approximately 350 to 1,200 feet above mean sea level (AMSL), while the elevation in the SOI ranges from approximately 450 to 1,325 feet AMSL. The Proposed Project area lies within several quadrangles of the California Geological Survey Map, including Prado Dam, La Habra, and Yorba Linda Quadrangles.

Soils

40 soil types have been identified in the Proposed Project area, including Alo clay, Alo variant clay, Anaheim clay loam, Anaheim loam, Apollo warm-Calleguas complex, Balcom clay loam, Blasingame-rock outcrop complex, Bosanko clay, Calleguas clay loam, Capistrano sandy loam, Cieneba sandy loam – eroded, Cieneba-Friant sandy loams complex, Cieneba-rock outcrop complex, Cropley clay, dam, Fontana clay loam, Gaviota-Chumash-rock outcrop complex, Marina loamy sand, Metz loamy sand, Mocho loam, Myford sandy loam, Myford sandy loam – eroded, Myford sandy loam – thick surface, Nacimiento clay loam, Omni clay, Rincon clay loam, riverwash, rock outcrop-Cieneba complex, San Emigdio fine sandy loam, Soper cobbly loam, Soper gravelly loam, Soper loam, Soper-rock outcrop complex, Sorrento clay loam, Sorrento loam, water, Xeralfic arents – loamy, Xerorthents loamy – cut and fill areas, Yorba cobbly sandy loam, and Zaca-Apollo – warm complex. Figure 4, Soils, of the BRTR (Appendix E to this PEIR) illustrates soil types within the Proposed Project area.

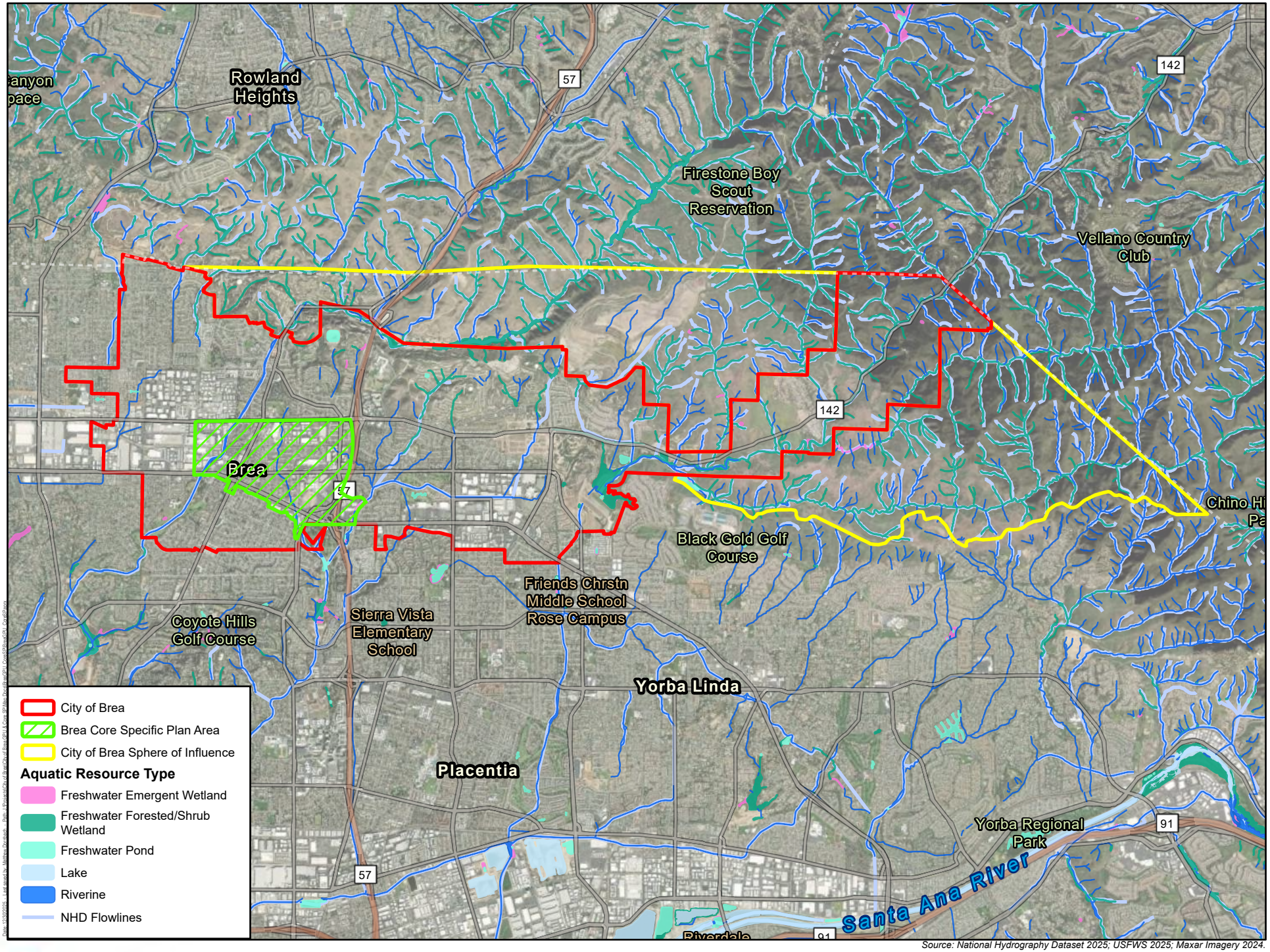
Hydrology

The Proposed Project area occurs within two watersheds, Coyote Creek watershed and the Santa Ana River Watershed (H_2OC Stormwater Program 2026). Together, these watersheds cover approximately 252 acres of land, and occur in Orange, San Bernardino, and Los Angeles counties. Both watersheds capture flows which drain west into the Pacific Ocean. The primary waterways in these watersheds include the Coyote Creek, Brea Creek, Fullerton Creek, Santiago Creek, and the Santa Ana River. Irvine lake, a reservoir located in Silverado, California, is present in the Santa Ana River Watershed.

Figure 4.3-1, Hydrology, identifies the major hydrologic features documented in the vicinity of the Project area (USFWS 2025a; USGS 2025). Of the major hydrologic features documented in the region, the Santa Ana River is defined as traditional navigable waters by the USACE and is shown southeast of the Proposed Project area on Figure 4.3-1 (USACE 2025). Many of the other rivers and streams, as well as numerous creeks and drainages, are tributary to these traditional navigable waters or have direct connections to the Pacific Ocean.

Climate

On a regional level, the Proposed Project area has a Mediterranean climate, which is characterized by wet winters and warm, dry summers. Habitats in this region include both mesic (moist) habitats and xeric (dry) habitats. Generalized climate in the region is characterized by warm, dry summers and moist winters, which pushes the growing season to the wet months of the year (late winter to early spring). Vegetation often goes dormant (senescent) during the later summer months until initial rains start in the late fall. The rainy season in the Proposed Project area typically lasts from November through April and has an annual winter precipitation average of approximately 14 inches (Western Regional Climate Center 2026).



Source: National Hydrography Dataset 2025; USFWS 2025; Maxar Imagery 2024.

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Figure 4.3-1
Hydrology
Brea Focused General Plan Update and Brea Core Specific Plan

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Vegetation Communities

Vegetation community types are categorized into general overarching habitat categories under which the Manual of California Vegetation (MCV) alliances (Sawyer et. al. 2009) are described. Alliances listed in the Proposed Project area are based on the U.S. National Vegetation Classification System (USNVC) data reported by BIOS. The Project area consists of eight vegetation communities and three land cover types, including freshwater, freshwater emergent wetland, non-vegetated channel, cismontane woodland, riparian forest/scrub, annual grassland, chaparral, coastal scrub, agricultural land, disturbed land, and urban/developed land. The eight vegetation communities documented in the Project area include MCV alliances with vegetation associations that are considered sensitive by CDFW (CDFW 2025c). Other vegetation communities may be considered sensitive because impacts to these habitats are often regulated by the USFWS, CDFW, USACE, or RWQCB. The three land cover types, agricultural land, disturbed land, and urban/developed land, are not considered sensitive. These are summarized in Table 4.3-1, Vegetation Communities and Land Cover Types in the Proposed Project Area, and illustrated on Figure 4.3-2, Vegetation Communities and Land Cover Types.

Table 4.3-1. Vegetation Communities and Land Cover Types in the Proposed Project Area

Vegetation Community and Land Cover Type	Acres
Wetlands and Waters – Vegetation Communities	
Fresh Water[1]	14.40
Freshwater Emergent Wetland[1]	35.81
Non-Vegetated Channel[1]	25.01
Upland Habitats – Vegetation Communities	
Cismontane Woodland[1]	886.77
Riparian Forest/Scrub[1]	604.04
Annual Grassland[1]	2,042.30
Chaparral[1]	789.74
Coastal Scrub [1]	1,728.22
Land Cover Types	
Agricultural Land	106.68
Disturbed Land	2,705.03
Urban/Developed Land	5,578.52

Sources: CDFW 2025b.

Notes:

[1] Associated with MCV alliances that contain sensitive vegetation associations.

Wetlands and Waters

Freshwater

Freshwater, which is typically an unvegetated habitat, includes year-round bodies of freshwater in the form of lakes, streams, ponds, or rivers. This includes those portions of water bodies that are

usually covered by water and contain less than 10 percent vegetated cover. BIOS did not report any specific MCV alliances associated with freshwater.

Approximately 14.40 acres of freshwater occur within the Proposed Project area. Freshwater may fall under the regulatory jurisdiction of the USACE, USFWS, RWQCB, or CDFW.

Freshwater Emergent Wetland

Freshwater emergent wetlands are generally persistent wetlands dominated by low-growing, perennial wetland species and can be found in channels, seeps, and springs; floodplains; margins of lakes and rivers; and various basins such as pools and ponds, palustrine lakes, montane meadows, and dune swales. BIOS did not report any specific MCV alliances associated with freshwater emergent wetland.

Approximately 35.81 acres of freshwater emergent wetland occurs along documented aquatic resources within the Proposed Project area. Freshwater emergent wetland has the potential to fall under the regulatory jurisdiction of the USACE, USFWS, RWQCB, or CDFW.

Non-Vegetated Channel

Non-vegetated channel consists of predominantly sandy, gravelly, or rocky channels lacking or with reduced vegetation. Variable water lines inhibit the growth of vegetation, although some weedy species of grasses may grow along the outer edges of the channel. Vegetation may exist here but is usually less than 10 percent of the total cover. BIOS did not report any specific MCV alliances associated with non-vegetated channel.

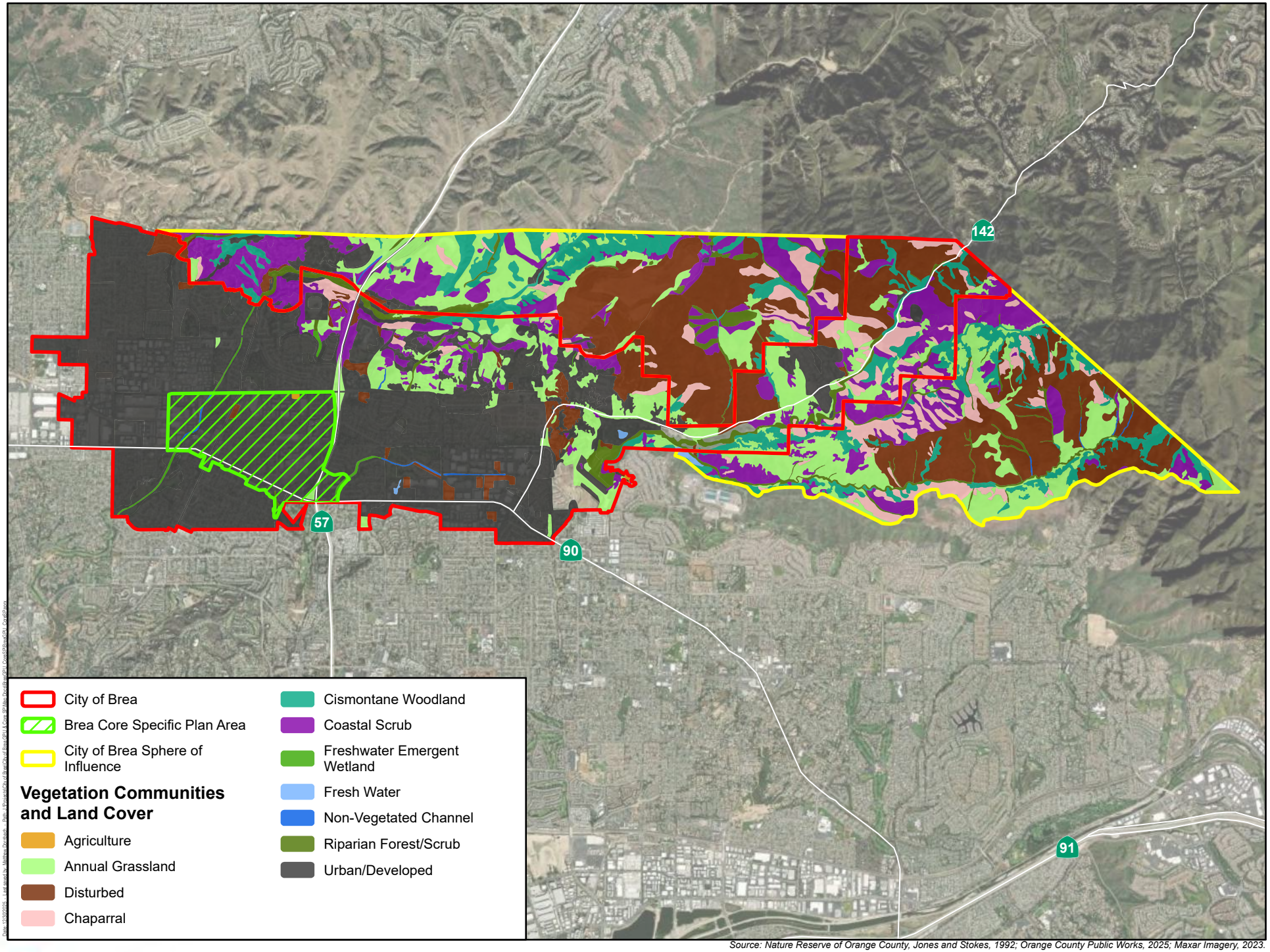
Approximately 25.01 acres of non-vegetated channel occur in the Proposed Project area. Non-vegetated channel can be found along numerous streams and drainages that occur throughout the Proposed Project area and has the potential to fall under the regulatory jurisdiction of the USACE, USFWS, RWQCB, or CDFW.

Upland Habitats

Cismontane Woodland

Cismontane woodland documented in the Proposed Project area is associated with the MCV *Juglans californica* (California black walnut) alliance and the *Quercus agrifolia* (coast live oak) alliance, both of which contain MCV vegetation associations that are considered sensitive (CDFW 2025c). *Juglans californica* alliances are woodlands dominated or co-dominated by California black walnut, with canopy heights up 15 meters tall, open to continuous canopies, sparse to intermittent shrub layers, and a sparse or grassy understory. *Quercus agrifolia* alliances are upland woodlands dominated or co-dominated by coast live oak. These woodlands grow up to 30 meters tall, with open to continuous canopies, sparse to intermittent shrub layers, and sparse or grassy understories.

Approximately 886.77 acres of cismontane woodland occurs in the Proposed Project area, primarily in the northern and eastern portions.



Source: Nature Reserve of Orange County, Jones and Stokes, 1992; Orange County Public Works, 2025; Maxar Imagery, 2023.

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Figure 4.3-2
Vegetation Communities and Land Cover Types
Brea Focused General Plan Update and Brea Core Specific Plan

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Riparian Forest/Scrub

Riparian forest and scrub communities documented in the Project area are associated with the MCV *Sambucus nigra (*black elderberry*)* alliance, *Baccharis salicifolia* (mule fat) alliance, *Salix lasiolepis* (arroyo willow) alliance, *Salix gooddingii* (Goodding's willow) alliance, and *Platanus racemosa* (Western sycamore) alliance. All of these alliances include MCV vegetation associations that are considered sensitive (CDFW 2025c). *Baccharis salicifolia* alliances are shrub communities dominated or co-dominated by mule fat. They contain two canopy tiers, with heights of 2 meters and 5 meters, and sparse understories. *Salix lasiolepis* alliances are riparian shrub communities dominated or co-dominated by arroyo willow. They grow up to 10 meters in height, and canopies are open to continuous. Understories are variable. *Salix gooddingii* alliances are woodlands dominated or co-dominated by Goodding's willow. Canopy heights reach up to 30 meters and are open to continuous. Shrub layers are sparse to continuous, and understories are variable. *Platanus racemosa* alliances are riparian woodlands dominated or co-dominated by western sycamore. Canopies are open to intermittent and reach heights up to 35 meters. The shrub layer is open to intermittent, and understories are sparse or grassy.

Approximately 604.04 acres of riparian forest/scrub occur in the Proposed Project area, primarily in the eastern portion. The riparian forest/scrub in the Proposed Project area may fall under the regulatory jurisdiction of the CDFW.

Annual Grassland

Generally, annual grasslands are dominated by annual grasses and forbs. Grass species may be native or non-native but are generally dominated by oat (*Avena* sp.), red brome (*Bromus rubens*), ripgut brome (*Bromus diandrus*), barley (*Hordeum* sp.) and mustard (*Brassica* sp.). BIOS did not report any specific MCV alliances associated with annual grassland documented in the Project area. Approximately 2,042.30 acres of annual grassland occurs in the Proposed Project area, primarily along moderate to steeply sloped hillsides in the northern and eastern portions of the Proposed Project area.

Chaparral

Chaparral documented in the Proposed Project area is associated with the MCV *Quercus berberidifolia* (Scrub oak) alliance and *Heteromeles arbutifolia* (Toyon) alliance, both of which include MCV vegetation associations that are considered sensitive (CDFW 2025c). *Quercus berberidifolia* alliances are shrub communities dominated or co-dominated by scrub oak. They grow to heights of 6 meters and have continuous canopies. The understories are sparse. *Heteromeles arbutifolia* alliances are shrub communities dominated or co-dominated by toyon and grow to heights of up to 15 meters. The canopies are open to continuous, and understories are sparse to continuous. Approximately 789.74 acres of chaparral occurs in the Proposed Project area, primarily along steep hillsides in the northern and eastern portions of the Proposed Project area.

Coastal Scrub

Coastal scrub documented in the Proposed Project area is associated with the MCV *Opuntia littoralis* (coast prickly pear) alliance, *Artemisia californica* (California sagebrush) alliance, *Malosma laurina* (laurel sumac) alliance, *Eriogonum fasciculatum (*California buckwheat) alliance, *Atriplex lentiformis* (big saltbush) alliance, *Salvia mellifera (*black sage) alliance, *Artemisia californica – Salvia mellifera* alliance, and *Artemisia californica – Eriogonum fasciculatum* alliance. All alliances, except the *Salvia mellifera* alliance, include MCV vegetation associations that are considered sensitive (CDFW 2025c). *Opuntia littoralis* alliances are shrub communities dominated or co-dominated by coast prickly pear. Canopies are intermittent or continuous and occur in two tiers, with heights up to 2 meters. The understories are continuous and diverse. *Artemisia californica* alliances are shrub communities co-dominated by California sagebrush. *Artemisia californica* alliances may contain one or two tiers, reaching two meters to five meters tall. Canopies are intermittent to continuous, and understories are variable both seasonally and annually. *Malosma laurina* alliances are shrub communities dominated or co-dominated by laurel sumac. They grow up to five meters tall and have open to continuous canopies. Understories are sparse or grassy. *Eriogonum fasciculatum* alliances are shrub communities dominated or co-dominated by California buckwheat. Shrubs reach up to two meters, and canopies are continuous or intermittent. Understories are variable and may be grassy. *Atriplex lentiformis* alliances are shrub communities dominated by big saltbush. They consist of open to intermittent canopies reaching heights of up to five meters. The understories are variable. *Salvia mellifera* alliances are shrub communities dominated or co-dominated by black sage. *Salvia mellifera* alliances may contain one or two tiers, reaching up to two meters tall. Canopies are intermittent to continuous, and understories are variable; grasses and herbs are seasonal. *Artemisia californica – Salvia mellifera* alliances are shrub communities co-dominated by California sagebrush and black sage with a relatively open canopy. The understories are well-developed. *Artemisia californica – Eriogonum fasciculatum* alliances are shrub communities co-dominated by California sagebrush and California buckwheat. The canopy may be one or two-tiered, with heights of two to five meters, and ranging from intermittent to continuous in coverage. Understories are well-developed.

Approximately 1,728.22 acres of coastal scrub occurs in the Proposed Project area, primarily along steep hillsides in the northern and eastern portions of the Proposed Project area.

Land Cover Types

Agricultural Land

Agricultural land is not considered a vegetation community; therefore, BIOS did not report any MCV alliances associated with agricultural land Agricultural land includes areas occupied by dairies and livestock feed yards or areas that have been tilled for use as croplands or groves and orchards.

Approximately 106.68 acres of agricultural land occurs primarily in the central and southern portions of the Proposed Project area. The agricultural land in the Proposed Project area is primarily composed of vineyards, fruit orchards, and grain crops.

Disturbed Land

Disturbed land is not considered a vegetation community, therefore BIOS did not report any MCV alliances associated with disturbed land. Disturbed land consists of previously disturbed areas that either are devoid of vegetation (dirt roads/trails) or support scattered non-native plant species, such as ornamentals or ruderal exotic species, that take advantage of disturbance, such as black mustard (*Brassica nigra*), short-pod mustard (*Hirschfeldia incana*), and *Erodium* species. These species are non-native and typically found in disturbed habitats, particularly in areas that have been graded, repeatedly cleared for fuel management purposes, and/or experienced repeated use that prevents natural revegetation.

Approximately 2,705.03 acres of disturbed land occurs in the Proposed Project area. Disturbed land primarily consists of barren hillsides located in the eastern portion of the Proposed Project area.

Urban/Developed Land

Urban/developed land is not considered a vegetation community, therefore BIOS did not report any MCV alliances associated with urban/developed land. (Holland 1986). Urban/developed land represents areas that have been constructed on or otherwise physically altered to an extent that native vegetation communities are not supported. This land cover type generally consists of semi-permanent structures, homes, parking lots, pavement or hardscape, and landscaped areas that require maintenance and irrigation (e.g., ornamental greenbelts). Typically, this land cover type is unvegetated or supports a variety of ornamental plants and landscaping.

Urban/developed land occupies the greatest amount of the Proposed Project area, encompassing approximately 5,578.52 acres of the Proposed Project area. The urban/developed land mainly occurs within the City itself, in the western portion of the Project area.

Jurisdictional Wetlands and Waters

The Project area supports wetlands and waters potentially subject to the regulatory jurisdiction of the USACE pursuant to Section 404 of the CWA, RWQCB pursuant to Section 401 of the CWA or the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), and the CDFW pursuant to Section 1600 et seq. of the CFGC. Aquatic and riparian vegetation communities occurring in the Project area may fall under the regulatory jurisdiction of the USACE, RWQCB, or CDFW.

As described above, numerous major and minor aquatic features occur across the two watersheds in which the Proposed Project area is located. This includes features that are defined by the USACE as traditional navigable waters, are tributaries, or have direct connections to the Pacific Ocean. Most of the rivers, streams, and creeks that occur in the Proposed Project area are documented aquatic resources under the jurisdiction of the USACE, RWQCB, and CDFW, pursuant to Sections 404 and

401 of the CWA and Section 1602 of the CFGC, respectively. The wetlands, waters, and riparian vegetation communities documented in the Project area/scrub, may also be under Federal and State jurisdiction. In addition, wetland waters and non-wetland waters, including non-vegetated stream channels, erosional features, gullies, and concrete-lined channels, that occur in the Project area.

Sensitive Plant and Wildlife Species

Sensitive species are those recognized by Federal, State, or local agencies as being potentially vulnerable to impacts because of rarity, local or regional reductions in population numbers, isolation/restricted genetic flow, or other factors. Sensitive plant species include those listed as threatened or endangered, proposed for listing, or candidates for listing by the USFWS and CDFW; those considered sensitive by the CDFW; or those species included in the California Rare Plant Rank (CRPR) inventory, maintained by the CNPS. Sensitive wildlife species include those listed as threatened or endangered, proposed for listing, candidates for listing by the USFWS and CDFW; those considered sensitive by the CDFW; or the CDFW Watch List (WL).

Based on the database search results, which included a 1-mile buffer in addition to the Proposed Project area for the CNDDB, a two quadrangle search (La Habra and Yorba Linda) for the CNPS inventory and the IPaC query, 10 sensitive plant species and 20 sensitive wildlife species have been documented in and have the potential to occur in the Proposed Project area (Figure 4.3-3, Historical Species with Potential to Occur).

Sensitive Plant Species

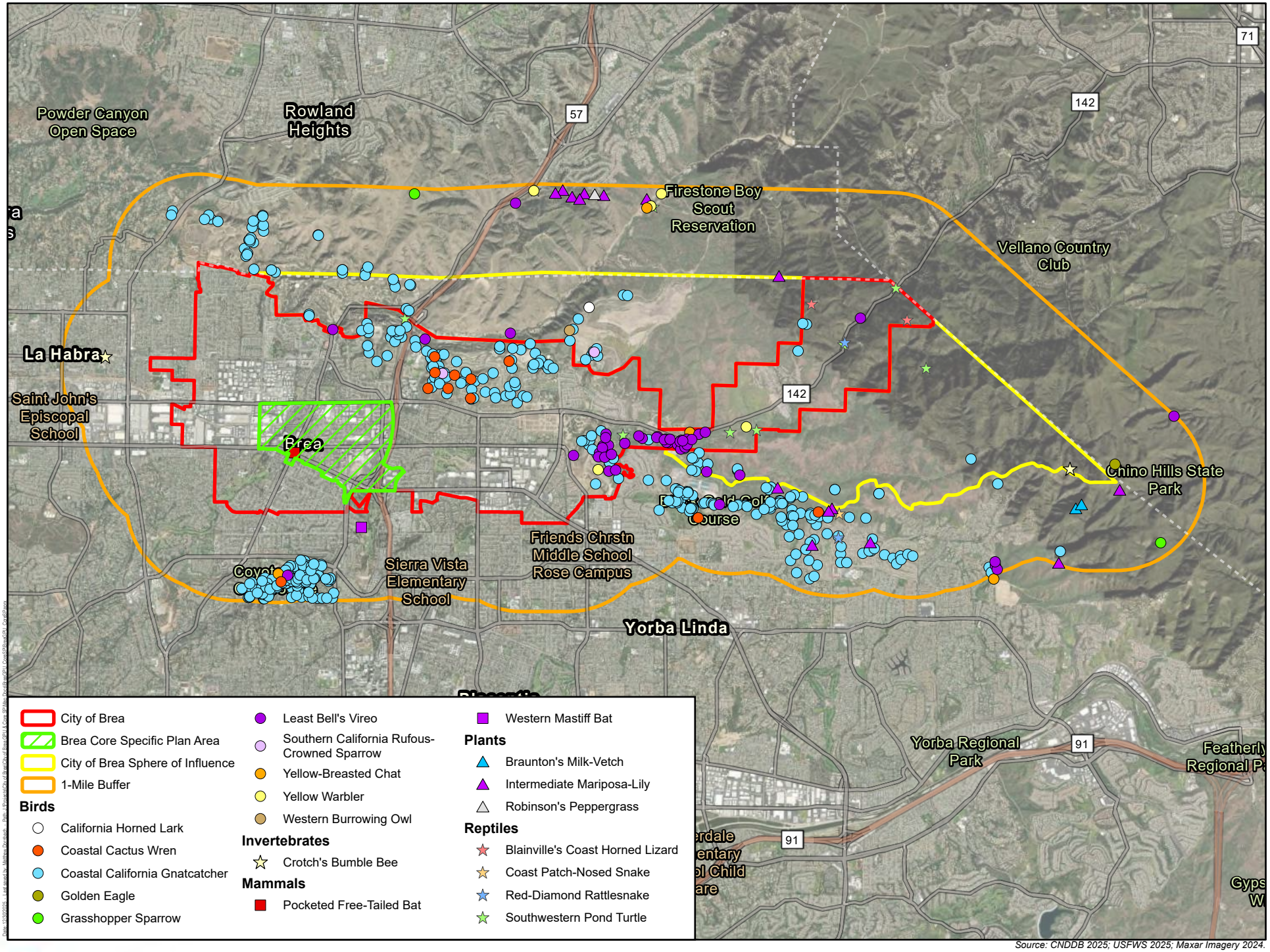
A total of 10 sensitive plant species (Table 4.3-2, Sensitive Plant Species Documented in the Proposed Project Area) have been documented within a 1-mile buffer of the Proposed Project area as described below.

Table 4.3-2. Sensitive Plant Species Documented in the Proposed Project Area

Scientific Name	Common Name	Federal/State/CRPR
Astragalus brauntonii	Braunton's milk-vetch	FE/None/1B.1
Berberis nevinii	Nevin's barberry	FE/CE/1B.1
Calochortus weedii var. intermedius	Intermediate mariposa-lily	None/None/1B.2
Dudleya multicaulis	Many-stemmed dudleya	None/None/1B.2
Eriastrum densifolium ssp. *sanctorum*	Santa Ana River woollystar	FE/CE/1B.1
Juglans californica	Southern California black walnut	None/None/4.2
Lepidium virginicum var. *robinsonii*	Robinson's pepper-grass	None/None/4.3
Nasturtium gambelii	Gambel's water cress	FE/CT/1B.1
Phacelia hubbyi	Hubby's phacelia	None/None/4.2
Romneya coulteri	Coulter's matilija poppy	None/None/4.2

Sources: Calflora 2025; CDFW 2025a, 2025b; CNPS 2025; USFWS 2025b.

Notes: CE = California endangered; CRPR = California Rare Plant Rank; CT = California threatened; FE = Federally endangered; CRPR: 1B = rare, threatened, or endangered in California and elsewhere;.1 = seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat);.2 = moderately threatened in California (20–80 percent occurrences threatened/moderate degree and immediacy of threat)



Source: CNDDB 2025; USFWS 2025; Maxar Imagery 2024.

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Figure 4.3-3

Historical Species with Potential to Occur

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Braunton's Milk-Vetch (*Astragalus brauntonii*)

Braunton's milk-vetch (*Astragalus brauntonii*) is a Federally endangered plant species with a CRPR of 1B.1. As of 2023, it is known from approximately 60 occurrences in Southern California, primarily in Los Angeles, Orange, and Ventura Counties. The species typically inhabits coastal scrub and valley or foothill grasslands, especially in recently burned or otherwise disturbed areas on sandstone substrates with carbonate layers, at elevations ranging from about 15 to 2,100 feet above mean sea level. Within the Project area, suitable habitats include coastal scrub and annual grassland, and the species was documented in the eastern portion of the Proposed Project area in 2013.

Nevin's Barberry-Vetch (*Berberis nevinii*)

Nevin's Barberry-vetch (*Berberis nevinii*) is a Federally endangered, State Endangered, with a CRPR 1B.1. It is distributed in Southern California, primarily within Los Angeles, San Bernardino, Riverside, and Ventura Counties. The species inhabits in chaparral, coastal scrub, cismontane woodland, and riparian scrub at elevations between 230 and 2705 feet AMSL (CNPS 2025). Within the Proposed Project area, suitable habitats include chaparral, coastal scrub, cismontane woodland, and riparian scrub. These species are documented in the western portion of the Proposed Project area, although years documented are unknown.

Intermediate Mariposa-Lily (*Calochortus weedii* var. *intermedius*)

Intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*) is a CRPR 1B.2 species known from Southern California, primarily within the South Coast and Peninsular Range regions. It occurs in coastal scrub and valley or foothill grasslands, typically on rocky, calcareous soils at elevations ranging from approximately 345 to 2,805 feet above mean sea level. Within the Proposed Project area, suitable habitat includes coastal scrub and annual grassland with calcareous soils, and the species has been documented in the southeastern and northeastern portions of the Proposed Project area. Records of occurrence span multiple years, including 1937, 1998, 2000, 2005, 2008, 2010, 2011, 2017, and 2019.

Many-Stemmed Dudleya (*Dudleya multicaulis*)

Many-stemmed dudleya (*Dudleya multicaulis*) is a CRPR 1B.2 species endemic to Southern California, with its distribution centered primarily in Orange County. The species occurs in chaparral, coastal scrub, and valley or foothill grasslands, often on clay soils, at elevations ranging from approximately 50 to 2,590 feet above mean sea level. Within the Proposed Project area, suitable habitat includes chaparral, coastal scrub, and annual grassland with clayey soils, and the species has been documented in the northwestern portion of the Proposed Project area, with the most recent record dating to 2020.

Santa Ana River Woollystar (*Eriastrum densifolium* ssp. *sanctorum*)

Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*) is a Federally and California-listed endangered plant species with a CRPR of 1B.1, endemic to the Santa Ana River drainage in Southern California. It inhabits chaparral and coastal scrub communities, typically in gravelly or sandy soils, at elevations ranging from approximately 300 to 2,000 feet above mean sea level. Within the Proposed Project area, suitable habitat includes chaparral and coastal scrub with sandy soils, and the species has been documented in the northern portion of the Proposed Project area, with the most recent record dating to 1980.

Southern California Black Walnut (*Juglans californica*)

Southern California black walnut (*Juglans californica*) is a CRPR 4.2 species distributed throughout the Central Valley and Coast Range valleys from northern to Southern California. The species occurs in chaparral, cismontane woodland, coastal scrub, and riparian woodland, typically on alluvial soils at elevations ranging from approximately 165 to 2,955 feet above mean sea level. Within the Proposed Project area, suitable habitat includes chaparral, coastal scrub, annual grassland, and cismontane woodland with alluvial soils, and the species has been documented in the northern, northeastern, and eastern portions of the Proposed Project area, with records from 2014, 2019, 2020, 2021, and 2022.

Robinson's Pepper-Grass (*Lepidium virginicum* var. *robinsonii*)

Robinson’s pepper-grass (*Lepidium virginicum* var. *robinsonii*) is a CRPR 4.3 species found in southwestern California, ranging from Santa Barbara to San Diego counties. It typically occurs in chaparral and coastal scrub habitats at elevations between approximately 5 and 2,905 feet above mean sea level. Within the Proposed Project area, suitable habitat includes chaparral and coastal scrub, and the species has been documented in the northern portion of the Proposed Project area, with the most recent record dating to 2010.

Gambel's Water Cress (*Nasturtium gambelii*)

Gambel’s water cress (*Nasturtium gambelii*) is a Federally endangered and California-listed threatened plant species with a CRPR of 1B.1, known from very few, scattered occurrences in Southern California. The species inhabits brackish and freshwater marshes and swamps at elevations ranging from approximately 15 to 1,085 feet above mean sea level. Within the Proposed Project area, suitable habitat consists of freshwater environments, and the species was documented in the southern portion of the Proposed Project area in 1980; however, this occurrence may now be extirpated.

Hubby's Phacelia (*Phacelia hubbyi*)

Hubby’s phacelia (*Phacelia hubbyi*) is a CRPR 4.2 species distributed along the southern coastal region of California, primarily in Santa Barbara, Ventura, Los Angeles, and Orange Counties. The

species occurs in chaparral, coastal scrub, and valley or foothill grasslands, typically on gravelly, rocky, or talus soils at elevations ranging from sea level to approximately 3,280 feet above mean sea level. Within the Proposed Project area, suitable habitat includes chaparral, coastal scrub, and annual grassland with rocky and talus soils, and the species has been documented in the eastern portion of the Proposed Project area in 2023 and 2025.

Coulter's Matilija Poppy (*Romneya coulteri*)

Coulter's Matilija poppy (*Romneya coulteri*) is a CRPR 4.2 species distributed throughout coastal and inland regions of Southern and Central California, with its range primarily centered in Orange and San Bernardino Counties. The species typically occurs in chaparral and coastal scrub habitats, often in areas that have experienced recent fire, at elevations ranging from approximately 65 to 3,935 feet above mean sea level. Within the Proposed Project area, suitable habitat includes chaparral and coastal scrub, and the species has been documented in the eastern portion of the Proposed Project area, with records dating to 2020.

Sensitive Wildlife Species

A total of 20 sensitive wildlife species (two invertebrates, five reptiles, 11 birds, and two mammals) have been documented in the Proposed Project area (Table 4.3-3, Sensitive Wildlife Species Documented in the Proposed Project Area).

Table 4.3-3. Sensitive Wildlife Species Documented in the Proposed Project Area

Species		Status
Scientific Name	Common Name	Federal/State
Invertebrates		
Bombus crotchii	Crotch's bumble bee	None/CCE
Danaus plexippus	Monarch butterfly	FPT/None
Reptiles		
Actinemys pallida	Southwestern pond turtle	FPT/SSC
Crotalus ruber	Red-diamond rattlesnake	None/SSC
Phrynosoma blainvillii	Blainville's (coast) horned lizard	None/SSC
Salvadora hexalepis virgultea	Coast patch-nosed snake	None/SSC
Spea hammondii	Western spadefoot toad	FPT/SSC
Birds		
Aimophila ruficeps canescens	Southern California rufous-crowned sparrow	None/WL
Ammodramus savannarum	Grasshopper sparrow	None/SSC
Aquila chrysaetos	Golden Eagle	BGEPA/CFP, WL
Athene cunicularia	Western burrowing owl	None/CCE, SSC
Campylorhynchus brunneicapillus sandiegensis	Coastal cactus wren	BCC/SSC
Empidonax traillii extimus	Southwestern willow flycatcher	FE/SE

Table 4.3-3. Sensitive Wildlife Species Documented in the Proposed Project Area

Species		Status
Scientific Name	Common Name	Federal/State
Eremophila alpestris actia	California horned lark	None/WL
Icteria virens	Yellow-breasted chat	None/SSC
Polioptila californica californica	Coastal California gnatcatcher	FT/SSC
Setophaga petechia	Yellow warbler	None/SSC
Vireo bellii pusillus	Least Bell's vireo	FE/CE
Mammals		
Eumops perotis californicus	Western mastiff bat	None/SSC
Nyctinomops femorosaccus	Pocketed free-tailed bat	None/SSC

Sources: CDFW 2025a, 2025b; USFWS 2025b.

Notes: BCC = Federal bird of conservation concern; BGEPA = Federal bald and golden eagle protection act; CCE = California candidate endangered; CE = California endangered; CFP= California fully protected; FE = Federally endangered; FPT = Federally proposed threatened; FT= Federally threatened; SSC = CDFW species of special concern; WL = CDFW watch list.

Invertebrates

Crotch's Bumble Bee (Bombus crotchii)

Crotch's bumble bee (*Bombus crotchii*) is a California candidate endangered species distributed in southwestern California. It occupies a wide range of habitats, including open grasslands, shrublands, chaparral, desert margins, creosote scrub, and semi-urban areas, and forages on plant species with open flowers and short corollas, most commonly within the Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, Hydrophyllaceae, Asclepiadaceae, and Boraginaceae families. Although specific hibernation sites are not well documented, the species is believed to overwinter in soft, disturbed soils and nest underground (Xerces Society 2018). Within the Project area, suitable habitat includes cismontane woodland, coastal scrub, chaparral, agricultural land, and urban or developed areas that provide underground cavities, abundant flowering nectar and pollen sources, and loose soils for overwintering. The species has been documented in the southeastern portion of the Proposed Project area, with records from 1968 and 2024.

Monarch Butterfly (Danaus plexippus)

Monarch Butterfly (Danaus plexippus) is a Federally proposed threatened species and CDFW SSC distributed in North America. It occurs in a variety of habitats where patches of milkweed (*Asclepias* sp.), the monarch caterpillar host plant, are present, and overwinters in groves of eucalyptus, cypress, and pine along the California coast and high-elevation forests in Mexico. Within the Proposed Project area, suitable habitat includes cismontane woodland, coastal scrub, chaparral, annual grassland, agricultural land, and urban/developed land with flowering nectar plants, and eucalyptus, cypress, or pine groves for overwintering.

Reptiles

Southwestern Pond Turtle (Actinemys pallida)

The southwestern pond turtle (*Actinemys pallida*) is a Federally proposed threatened species and a California Species of Special Concern, with a range restricted to the central Coast Range, extending south from the middle of Monterey Bay to Baja California. It inhabits slow-moving permanent or intermittent streams, ponds, lakes, wetlands, and reservoirs with emergent basking sites, spending most of its life in water but requiring adjacent terrestrial habitats for nesting and overwintering. Within the Proposed Project area, suitable habitat includes freshwater streams and ponds with surrounding uplands for nesting. The species has been documented in the central and eastern portions of the Proposed Project area, with records from 1996, 2010, 2011, and 2013.

Red-Diamond Rattlesnake (Crotalus ruber)

The red-diamond rattlesnake (*Crotalus ruber*) is a California Species of Special Concern, distributed throughout Southern California's coastal and inland foothills and extending south through most of the Baja California Peninsula. It inhabits arid deserts with rocky areas, chaparral, woodlands, and areas with dense vegetation. Within the Proposed Project area, suitable habitat includes chaparral, cismontane woodland, and disturbed areas with dense vegetation. The species has been documented in the eastern and southeastern portions of the Project area, with the most recent record from 1995.

Blainville's (Coast) Horned Lizard (Phrynosoma blainvillii)

Blainville's (Coast) horned lizard (*Phrynosoma blainvillii*) is a California Species of Special Concern, distributed from the Sierra Nevada foothills (Butte to Kern Counties) throughout the Central and Southern California coast. The species inhabits sandy soils in valley-foothill hardwood, conifer, and riparian habitats, as well as pine-cypress, juniper, and annual grassland habitats. Within the Proposed Project area, suitable habitat includes riparian forest and scrub as well as annual grassland with sandy soils. The species has been documented in the northeastern portion of the Proposed Project area, with records from 1985 and 2011.

Coast Patch-nosed Snake (Salvadora hexalepis virgultea)

The coast patch-nosed snake (*Salvadora hexalepis virgultea*) is a California Species of Special Concern, distributed across coastal and inland Southern California into northwestern Baja California, Mexico. It inhabits coastal sage scrub, chaparral, open woodlands, desert-edge habitats, and rocky hillsides and canyons with loose, sandy soils (Thomas et al 2016). Within the Proposed Project area, suitable habitat includes coastal scrub, chaparral, riparian forest and scrub, cismontane woodland, and annual grassland with sandy soils. The species has been documented in the southeastern portion of the Proposed Project area, with a record from 1993.

Western Spadefoot Toad (Phrynosoma blainvillii)

Western spadefoot toad (*Phrynosoma blainvillii*) is a California candidate threatened species and CDFW SSC distributed in California. It occurs primarily in grasslands, but occasional populations also occur in valley-foothill hardwood woodlands. Some populations persist for a few years in orchard or vineyard habitats (Zeiner et al 1988-1990). Suitable habitat in Proposed Project area includes cismontane woodland and annual grassland with water sources for breeding.

Birds

Southern California Rufous-Crowned Sparrow (Aimophila ruficeps canescens)

The Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) is a California WL species, distributed in Southern California and northwestern Baja California, Mexico. It inhabits coastal sage scrub and sparse mixed chaparral on rocky hillsides and in canyons, as well as open sage scrub and grassy areas in successional growth and is more common in areas burned within the past 15 years (Unitt 2004). Within the Proposed Project area, suitable habitat includes coastal scrub, chaparral, and annual grassland. The species has been documented in the central portion of the Proposed Project area, with records from 2005 and 2008.

Grasshopper Sparrow (Ammodramus savannarum)

The grasshopper sparrow (*Ammodramus savannarum*) is a California Species of Special Concern, with a range extending across the United States, Mexico, Canada, and Central America, though in California it is known only from coastal and central regions. It is restricted to grassland habitats, typically dominated by native bunchgrasses, where it nests hidden within dense grass clumps but forages in open areas such as prairies, hayfields, and pastures (Shuford et al. 2008). Within the Proposed Project area, suitable habitat consists of annual grassland. The species has been documented in the northern and southeastern portions of the Proposed Project area, with records from 2001 and 2011.

Golden Eagle (Aquila chrysaetos)

The golden eagle (*Aquila chrysaetos*) is protected under the Federal Bald and Golden Eagle Protection Act, is fully protected in California, and is listed on the CDFW WL. Its range extends from Alaska and northern Canada south through the western United States and Mexico, and it is also found across northern Europe, Asia, northern Africa, and parts of the Middle East and Himalayas. The species occurs in mountains up to 12,000 feet above mean sea level, canyon lands, rocky terrain, and riverside cliffs and bluffs, typically nesting on cliffs but occasionally using trees, the ground, or human-made structures and towers (USFWS 2025c). Within the Proposed Project area, suitable habitat includes steep canyons, crags, or bluffs within coastal scrub, chaparral, cismontane woodland, and riparian forest or scrub. The species has been documented in the central and southeastern portions of the Proposed Project area, with a record from 2007.

Western Burrowing Owl (Athene cunicularia)

The western burrowing owl (*Athene cunicularia*) is listed as a USFWS Bird of Conservation Concern and a California Species of Special Concern. It occurs throughout the United States, Mexico, Central and South America, and the northeast Caribbean. The species inhabits open, dry annual or perennial grasslands, deserts, and scrublands, as well as agricultural and ruderal landscapes, characterized by low-growing vegetation with available burrows or burrow-like structures such as culverts, and is often associated with high densities of burrowing small mammals (Shuford et al. 2008). Within the Proposed Project area, suitable habitat includes annual grassland and coastal scrub with low-growing vegetation and available small mammal burrows or burrow-like structures. The species has been documented in the north-central portion of the Proposed Project area, with a record from 2016.

Coastal Cactus Wren (Campylorhynchus brunneicapillus sandiegensis)

The coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*) is listed as a USFWS Bird of Conservation Concern and a California Species of Special Concern. Its range extends from northwestern Baja California through the coastal lowlands of San Diego County and into southern Orange County. The species inhabits coastal cholla and prickly pear (Opuntia littoralis and Opuntia oricola) patches within coastal sage scrub and maritime succulent scrub (Shuford et al. 2008). Within the Proposed Project area, suitable habitat includes coastal scrub with dense patches of cholla or prickly pear. The species has been documented in the central and south-central portions of the Proposed Project area, with records from 1995 and 2005.

Southwestern Willow Flycatcher (Empidonax traillii extimus)

Southwestern willow flycatcher (Empidonax traillii extimus) is a Federally endangered and State endangered species distributed in Arizona, California, Colorado, New Mexico, Texas, and Utah. It occurs in dense riparian vegetation along streams and suitable habitat in Proposed Project area include non-vegetated channel, riparian forest/scrub.

California Horned Lark (Eremophila alpestris actia)

California horned lark (*Eremophila alpestris actia*) is a California WL species distributed throughout California. It primarily inhabits grasslands and beach habitats but can also occupy disturbed lands, agricultural lands, and alpine fell fields in the Sierra Nevada (CDFW 2025d). Within the Proposed Project area, suitable habitat includes annual grassland and agricultural land. The species has been documented in the north-central portion of the Proposed Project area, with a record from 2008.

Yellow-Breasted Chat (Icteria virens)

Yellow-breasted chat (*Icteria virens*) is a California Species of Special Concern distributed across the United States, southern Canada, Mexico, and Central America. It occurs in riparian thickets of willow and other dense brush near waterways. Suitable habitat within the Project area includes riparian forest and scrub with dense willow coverage. The species has been documented in the northern, central, southern, and southeastern portions of the Proposed Project area, with records from 2001, 2011, 2013, and 2016.

Coastal California Gnatcatcher (Polioptila californica californica)

Coastal California gnatcatcher (*Polioptila californica californica*) is a Federally threatened and California Species of Special Concern, ranging from Southern California to Baja California, Mexico. It occurs almost exclusively in coastal sage scrub vegetation but can also inhabit chaparral and riparian habitats (USFWS 2010). Suitable habitat in the Proposed Project area includes coastal scrub and chaparral. The species has been documented in the northwestern, central, southeastern, and southwestern portions of the Proposed Project area, with over 400 occurrences recorded from 1985 through 2020.

Yellow Warbler (Setophaga petechia)

Yellow warbler (*Setophaga petechia*) is a California Species of Special Concern distributed throughout the United States, Canada, Mexico, and Central America. It primarily inhabits riparian woodlands and, less frequently, montane chaparral and mixed coniferous forests with dense brush. Within the Proposed Project area, suitable habitat includes riparian forest and scrub. The species has been documented in the central and northern portions of the Proposed Project area, with records from 2003, 2011, and 2016.

Least Bell's Vireo (Vireo belli pusillus)

Least Bell's vireo (*Vireo belli pusillus*) is a Federally and California-listed endangered species, breeding in California and northern Baja California, Mexico, and wintering in southern Baja California. It occurs in a variety of habitats but is most often associated with riparian areas vegetated with willow species below 2,000 feet in elevation, requiring dense understory shrub cover for nest concealment and an overstory dominated by willows. Within the Proposed Project area, suitable habitat includes riparian forest and scrub with dense understory and willow overstory. The species has been documented in the central, northern, eastern, and southeastern portions of the Proposed Project area, with 51 occurrences recorded from 1996 to 2018.

Mammals

Western Mastiff Bat (Eumops perotis californicus)

Western mastiff bat (*Eumops perotis californicus*) is a California Species of Special Concern, distributed from the San Joaquin Valley and Coastal Ranges from Monterey County through Southern California, extending from the coast eastward to the Colorado Desert. It occurs in open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban areas, and roosts in rock crevices, cliff faces, high buildings, trees, and tunnels (Zeiner et al. 1988–1990). Within the Project area, suitable habitat includes coastal scrub, chaparral, cismontane woodland, annual grassland, and urban/developed areas with appropriate tunnels, bridges, or buildings for roosting. The species has been documented in the south-central portion of the Proposed Project area, with a record from 2007.

Pocketed Free-Tailed Bat (Nyctinomops femorosaccus)

Pocketed free-tailed bat (*Nyctinomops femorosaccus*) is a California Species of Special Concern, distributed in the southwestern United States, Mexico, and Central America. It inhabits pinyon-juniper woodlands, desert scrub, desert succulent scrub, desert riparian areas, desert washes, alkali desert scrub, Joshua tree habitats, and palm oases, roosting in rock crevices, caverns, or buildings (Zeiner et al. 1988–1990). Within the Proposed Project area, suitable habitat includes rocky cliffs, crevices, caverns, and urban/developed areas with bridges, buildings, or tunnels suitable for roosting. The species has been documented in the central portion of the Proposed Project area, with a record from 1989.

Critical Habitat

Critical habitat is defined as the specific areas within the geographic range occupied by the species at the time of listing that contain the physical or biological features that are essential to the conservation of these endangered or threatened species and that may need special management or protection (USFWS 2025d).

Coastal California gnatcatcher was the only species with designated critical habitat mapped in the Proposed Project area and its vicinity (Figure 4.3-4, Critical Habitat) (USFWS 2025d). Critical habitat for coastal California gnatcatcher occurs throughout the northern, central, and southeastern portions of the Proposed Project area in areas of open space.

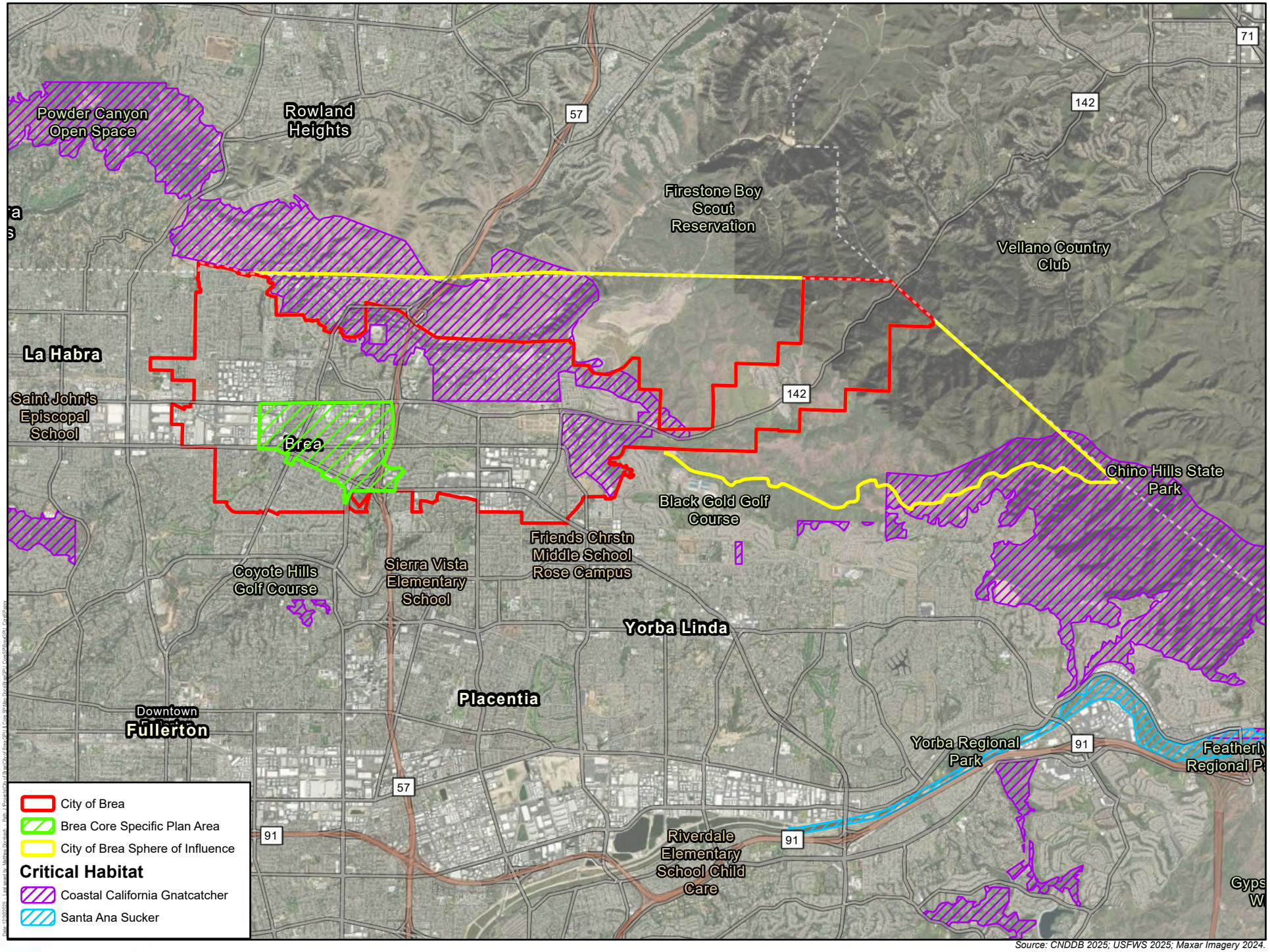
Nesting Birds

The Proposed Project area contains suitable nesting habitat for many bird and raptor species protected under the CFGC and the Migratory Bird Treaty Act (MBTA). The majority of habitat for nesting birds in the Proposed Project area occurs in the native and ornamental trees, shrubs, and buildings that occur throughout the Proposed Project area. The structures in the developed

land also have the potential to support nesting by certain species that use structures with eaves, ledges, crevices, cracks, and other "cavities," nest in or on utility structures, or nest on rooftops, such as black phoebe (*Sayornis nigricans*), gulls (*Larus* sp.), and Bewick's wren (*Thryomanes bewickii*). Suitable habitat for tree- and shrub-nesting species, including sensitive coastal California gnatcatcher, least Bell's vireo, and yellow warbler, is available in the coastal scrub, chaparral, cismontane woodland, riparian forest/scrub communities in the Project area. The trees throughout the Project area could also support nesting by more common birds, including Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), and orioles (*Icterus* sp.), which often nest in ornamental palm and eucalyptus trees. Grassland- and ground-nesting species, such as the sensitive grasshopper sparrow, California horned lark, and western burrowing owl, all documented in the Proposed Project area could nest in the annual grassland and open agricultural land throughout the Proposed Project area. The availability of large amounts of high-quality nesting habitat with access to nearby food and water sources make it very likely that birds and raptors use the Project area for nesting.

Sensitive Roosting Bats

The Proposed Project area contains suitable foraging and roosting habitat for sensitive bat species, including western mastiff bat, which was documented south of the Proposed Project area. The structures in the developed land of the Project area provide suitable roosting habitat for structure- and cavity-dwelling bats such as big brown bat (*Eptesicus fuscus*). Additionally, the numerous native trees in the cismontane woodland and riparian forest/scrub communities and the ornamental trees throughout the developed land of the Proposed Project area could provide suitable roosting habitat for tree-roosting bats, such as the hoary bat (*Lasiurus cinereus*) and western red bat (*Lasiurus blossevillii*), a CDFW species of special concern. There are also numerous non-vegetated channels, wetlands, and freshwater lakes and ponds present in the Proposed Project area which provide suitable foraging habitat for bats roosting in the area that forage over sources of open water, such as the western mastiff bat (*Eumops perotis*). The availability of suitable habitat indicates bats are likely roosting and foraging in the Proposed Project area.



Source: CNDDB 2025; USFWS 2025; Maxar Imagery 2024.

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Figure 4.3-4
Critical Habitat
Brea Focused General Plan Update and Brea Core Specific Plan

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Wildlife Corridors and Habitat Linkages

Wildlife corridors provide routes for local movement and also regional linkages and corridors, often following linear topographic, vegetation, or water features. These corridors can be continuous habitats features, or "stepping stone" areas, providing critical rest and foraging areas for birds traveling along migratory routes, for example. Local routes of movement provide constant connections to resources that include sources of water, home/cover sites, and foraging areas. Regional linkages and movement corridors provide larger patches of open space to allow relatively free movement of wildlife species along multiple paths between important resources. These areas allow for not only long-term genetic flow between subpopulations but also critical pathways of seasonal/migratory movements. Larger predatory mammals often use regional corridors for hunting and reproduction needs. Potential wildlife corridors can include streams, riparian areas, and culverts under roadways. Habitat characteristics considered included topography, habitat quality, and adjacent land uses.

The Proposed Project area provides opportunities for wildlife movement and dispersal and provides connections to surrounding and nearby open space areas. In addition, the Proposed Project area contains suitable nesting, foraging, and nursery sites for many wildlife species.

The major aquatic resources, including rivers and streams, as well as riparian corridors around many of these features, provide important wildlife movement corridors throughout the Proposed Project area. These areas function to facilitate amphibian, fish, reptile, bird, and mammal movement in the region.

The Puente-Chino Hills area, located within and surrounding the northern and eastern portions of the Proposed Project area, provides connectivity between the Santa Ana mountains to the south and the San Gabriel mountains to the north, and function as a vital corridor for wildlife movement through the open space and native vegetation communities that occur in these areas.

The Proposed Project area is also in the Pacific Flyway, the major migratory bird corridor of the western United States. The Proposed Project area contains open space, native vegetation, and aquatic resources, and its position in the Pacific Flyway migratory corridor makes it very likely to provide habitat for migratory birds traveling between nesting and wintering areas.

According to the California Essential Habitat Connectivity Project, which maps relatively natural habitat blocks that support native biodiversity, several areas spanning from northeast to southwest in the western portion of the Proposed Project area serve as natural landscape blocks (CDFW 2025e). Additionally, small natural areas are scattered throughout the Proposed Project area (Figure 4.3-5, Wildlife Corridors/NCCPs).

The Proposed Project area is likely to be used as a movement corridor for both sensitive and common wildlife species because of the native vegetation communities, undeveloped open space, inland mountainous regions, and numerous freshwater aquatic resources within and adjacent to the Proposed Project area. The open space within the Proposed Project area has the potential to provide important habitat connectivity both locally and regionally.

Brea Core Specific Plan

Topography

Topographically, the BCSP area gently slopes downward from north to south, from an elevation of approximately 390 feet AMSL near the intersection of Lambert Road and Brea Boulevard to approximately 328 feet AMSL near Imperial Highway and Randolph Avenue. The BCSP area lies within the La Habra Quadrangle of the California Geological Survey map.

Soils

The BCSP area includes the following soil types: Alo clay, Myford sandy loam, Rincon clay loam, San Emigdio fine sandy loam, Sorrento loam, Sorrento clay, and Xerorthents loamy—cut and fill areas. Figure 4, Soils, of the BRTR illustrates the soil types within the Proposed Project area, including the BCSP area.

Hydrology

The BCSP area occurs within the Coyote Creek watershed (H2OC Stormwater Program 2025).

Climate

The climate of the BCSP area is described under the overall Focused GPU subheading.

Vegetation Communities

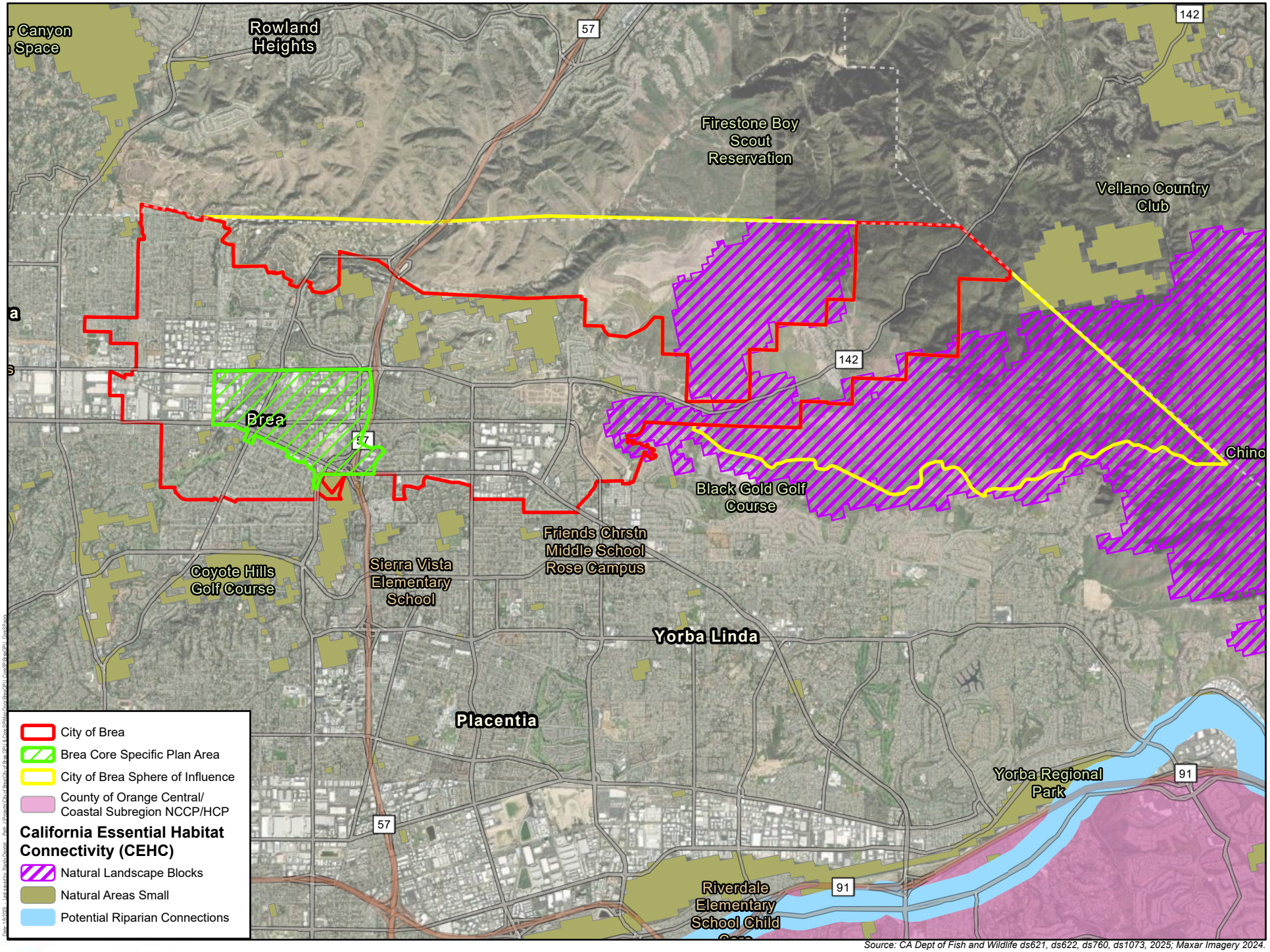
As shown in Table 4.3-4, Vegetation Communities and Land Cover Types in BCSP Area, vegetation communities within the BCSP area include annual grassland, non-vegetated channel, and freshwater emergent wetland; and land cover types include urban/developed, disturbed, and agricultural lands. Descriptions of these vegetation communities and land cover types are provided under the overall Focused GPU subheading.

Table 4.3-4. Vegetation Communities and Land Cover Types in BCSP Area

Vegetation Community and Land Cover Type	Acres
Wetlands and Waters – Vegetation Communities	
Non-Vegetated Channel[1]	5.48
Upland Habitats – Vegetation Communities	
Riparian Forest/Scrub[1]	6.3
Annual Grassland[1]	5.25
Land Cover Types	
Agricultural Land	2.78
Disturbed Land	4.75
Urban/Developed Land	753.1

Sources: CDFW 2025b.

Notes: [1] Associated with MCV alliances that contain sensitive vegetation associations.



Source: CA Dept of Fish and Wildlife ds621, ds622, ds760, ds1073, 2025; Maxar Imagery 2024.

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Figure 4.3-5
Wildlife Corridor/NCCPs

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Sensitive Plant and Wildlife Species

The same 10 sensitive plant species (Table 4.3-2) documented for the Focused GPU area have also been documented in the BCSP area, based on California Natural Diversity Database searches of the La Habra and Yorba Linda quadrangles and the CNPS inventory. In addition, the same 20 wildlife species (Table 4.3-3) have been documented and have the potential to occur in the BCSP area based on the IPaC query search (Calflora 2025; CDFW 2025a; CDFW 2025b; CNPS 2025; USFWS 2025b).

Critical Habitat

As shown on Figure 4.3-4, no critical habitat has been designated within the BCSP area.

Nesting Birds

The BCSP area includes ornamental trees, shrubs, and buildings that provide suitable habitat for nesting birds. The same nesting bird conditions described for the Focused GPU area are applicable to the BCSP area.

Sensitive Roosting Bats

Structures, ornamental trees, and non-vegetated channels within developed areas of the BCSP provide suitable foraging and roosting habitat for sensitive bat species, including the big brown bat (*Eptesicus fuscus*), hoary bat (*Lasiurus cinereus*), western red bat (*Lasiurus blossevillii*), and western mastiff bat (*Eumops perotis*).

Wildlife Corridors and Habitat Linkages

The BCSP area contains small natural areas identified by the California Essential Habitat Connectivity Project at the southern end of South Randolph Avenue. In addition, a non-vegetated channel (Brea Canyon Channel) bisects the western portion of the BCSP area. As discussed under the Focused GPU subheading for Wildlife Corridors and Habitat Linkages, major aquatic resources, including riparian corridors, provide important wildlife movement corridors. Therefore, the BCSP area is likely to be used as a movement corridor for both sensitive and common wildlife species.

4.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact on biological resources if it would:

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

- **Threshold BIO-b:** Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- **Threshold BIO-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.
- **Threshold BIO-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.
- **Threshold BIO-e:** Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- **Threshold BIO-f:** Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

4.3.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Proposed Project and help reduce or avoid potential impacts related to biological resources:

PPP BIO-1 Potential direct/indirect impacts to common and sensitive bird and raptor species will require compliance with the CFGC, Section 3503. Construction outside the nesting season (between September 16 and January 14) does not require pre-removal nesting bird surveys. If construction is proposed between January 15 and September 15, a qualified biologist must conduct a nesting bird survey(s) no more than 7 days prior to initiation of grading to document the presence or absence of nesting birds within or directly adjacent (100 feet) to the project site. The survey(s) will focus on identifying any raptors and/or bird nests that are directly or indirectly affected by construction activities. If active nests are documented, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the City of Brea for review and approval prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a

construction monitor during periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final monitoring report of the findings, prepared by a qualified biologist, shall be submitted to the City of Brea documenting compliance with the CFGC. Any nest permanently vacated for the season would not warrant protection pursuant to the CFGC.

PPP BIO-2 Development implemented under the Proposed Project will be subject to the BCC Chapter 20.74, Tree Preservation, and preserve and propagate the protected trees as defined therein.

PPP BIO-3 Development implemented under the Proposed Project is required to remove, plant, replace, and maintain street trees in accordance with the BCC Chapter 12.20, Street Trees.

PPP BIO-4 Development implemented under the Proposed Project is required to comply with the California Building Code and all other applicable laws, rules, and regulations governing grading in the City of Brea.

PPP BIO-5 Development implemented under the Proposed Project will implement Design Guidelines and Development Regulations and Standards. All subsequent development within the Project area is required to conform with the provisions discussed in the design and development sections.

4.3.4 Environmental Impacts

Impacts to biological resources from implementation of the Proposed Project are categorized quantitatively as direct and indirect impacts.

Direct impacts to biological resources occur when significant alterations or destruction occurs during the course of, or because of, project implementation. Examples of such impacts include removing, disturbing, or grading vegetation; dredging or grading a stream bank; filling wetlands with any materials; erecting any structures, including in a stream; and severing or physically restricting wildlife corridors and the distribution of individual species or resources. Other direct impacts may include loss of foraging or nesting habitat and loss of individual species as a result of habitat clearing.

Indirect impacts may include elevated levels of noise or lighting, change in surface water hydrology within a floodplain, and increased erosion or sedimentation. These types of indirect impacts can affect vegetation communities or their potential use by sensitive species. They can also cause the disruption of normal wildlife functions or activities, impacting individual species.

Within the direct and indirect quantitative impacts categories, impacts are also qualified temporally as permanent and temporary impacts.

Permanent impacts may result in irreversible damage to biological resources, including habitat or removal of species from a particular area.

Temporary impacts are interim changes in the local environment due to construction and would not extend beyond project-associated construction, including revegetation of temporarily disturbed areas adjacent to native habitats.

An analysis of the exact acreage of direct impacts that would occur on biological resources, including sensitive plant and wildlife species, sensitive vegetation communities, jurisdictional aquatic resources, and wildlife corridors and habitat linkages, in the Proposed Project area from project implementation is not provided at the programmatic level. This is because such an analysis would be speculative in nature since focused surveys were not conducted, and future site-specific project designs are not known at this time.

The following sections address various potential impacts relating to biological resources that could result from implementation of the Proposed Project.

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

Impact Analysis

The database search conducted for the Proposed Project relied on the California Natural Diversity Database (CNDDB), a two quadrangle search (La Habra and Yorba Linda quadrangles) of the CNPS Inventory, and an IPaC query for Federally listed endangered and threatened species, designated critical habitat, and migratory birds. Based on these searches, the list of sensitive plant species and the sensitive wildlife species are the same for both the overall Project area and the BCSP area, even though the BCSP is composed of only one vegetation community (i.e., annual grassland) and three land cover types (i.e., agricultural land, disturbed land, and urban/developed land). Therefore, an analysis for the BCSP area has not been addressed separately.

Focused General Plan Update and Brea Core Specific Plan

Sensitive Plant Species

Direct Impacts

A total of 10 sensitive plant species are documented based on the database search results, which included the Proposed Project area and a 1-mile buffer (refer to Table 4.3-2). The Proposed Project area consists of eight habitats and three land cover types (refer to Table 4.3-1), including freshwater, freshwater emergent wetland, non-vegetated channel, cismontane woodland, riparian

forest/scrub, annual grassland, chaparral, coastal scrub, agricultural land, disturbed land, and urban/developed land. The potential for these habitats and land cover types to provide suitable habitat for sensitive plant species is summarized below.

Urban/developed Land, Disturbed land, and Agricultural Land. Impacts on urban/developed land and agricultural land, which comprises approximately 5,685 acres, have a low potential to impact sensitive plant species because these areas provide little to no suitable habitat value for the sensitive plant species documented in the Proposed Project area. However, impacts on disturbed land have the potential to impact sensitive plant species. Impacts to these disturbed habitat could result in potentially significant impacts without mitigation.

Freshwater, Freshwater Emergent Wetland, and Non-Vegetated Channel. The aquatic habitats present in the Proposed Project area, including freshwater, freshwater emergent wetland, and non-vegetated channel, have the potential to support sensitive plant species, including Gambel's water cress. Impacts to these vegetation communities could result in potentially significant impacts without mitigation.

Cismontane Woodland and Riparian Forest/Scrub. The cismontane woodland and riparian forest/scrub communities throughout the Proposed Project area have the potential to support sensitive plants documented in the Proposed Project area, including southern California black walnut. Impacts to these vegetation communities could result in potentially significant impacts without mitigation.

Annual Grassland, Chaparral, and Coastal Scrub. The upland vegetation communities of annual grassland, chaparral, and coastal scrub present in the Proposed Project area provide suitable habitat for many of the sensitive plant species documented as occurring in the Proposed Project area, such as Braunton's milk-vetch, intermediate mariposa-lily, many-stemmed dudleya, Santa Ana River woollystar, Robinson's pepper-grass, Hubby's Phacelia, Coulter's and Matilija Poppy. Impacts to these vegetation communities could result in potentially significant impacts without mitigation.

Impacts to the vegetation communities listed above as well as disturbed habitat are assumed to be significant without mitigation because they could result in impacts to sensitive plant species. Prior to impacts to undeveloped areas that could support sensitive plant species occurring in the Proposed Project area, a site-specific biological survey shall be required to be conducted to determine the presence and potential for occurrence of sensitive plant species and to quantify potential impacts on these resources. While suitable habitats for the historically documented sensitive plant species may be present in the Proposed Project area, many of these species have specific microhabitat requirements, including soils and elevation range restrictions, that may reduce the potential for these species to occur on a particular site. Therefore, site-specific biological surveys are needed to analyze potential impacts.

If the results of the biological survey determine that sensitive plant species are not present and do not have a high potential to occur, direct impacts to sensitive plant species would be less than significant, and no further mitigation is required.

Alternatively, if the results of the biological survey determine that sensitive plant species are present or have a high potential to occur due to available suitable habitat, direct impacts to sensitive plant species would occur and further mitigation would be required.

Indirect Impacts

Temporary indirect impacts to sensitive plant species could result during project implementation, and may include dust, which could disrupt plant vitality in the short term, or construction-related soil erosion and runoff. Permanent edge effects, which are changes that occur at the boundary between two different communities or habitats (i.e., native habitat and urban/developed land), could result during operation of the Proposed Project. These edge effects may include intrusions by humans and therefore possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality).

These indirect impacts are project-specific and variable; therefore, potential indirect impacts resulting from the operation of individual projects facilitated by the Proposed Project would need to be addressed on a project-by-project basis through subsequent environmental review.

Like the discussion under Sensitive Plant Species, Direct Impacts, if the results of the biological surveys determine that sensitive plant species are not present and do not have a high potential to occur, indirect impacts to sensitive plant species would be less than significant, and no further mitigation would be required.

Alternatively, if the results of the biological survey determine that sensitive plant species are present or have a high potential to occur due to available suitable habitat, indirect impacts to sensitive plant species could occur.

However, the Proposed Project would be required to be in compliance with State and local regulations controlling erosion and stormwater runoff, including the National Pollutant Discharge Elimination System (NPDES) Construction General Permit provisions, which would trigger preparation and compliance with an approved Stormwater Pollution Prevention Plan that would consider the full range of erosion control best management practices (BMPs), including any additional site-specific and seasonal conditions to minimize any water quality and erosion impacts that could result during construction. The City of Brea participates in the NPDES permit program via a partnership consisting of Orange County, all cities within Orange County, and the County

Flood Control District. Therefore, through compliance with these regulations, indirect impacts to sensitive plant species would be less than significant, and no mitigation is required.

Sensitive Wildlife Species

Direct Impacts

A total of 20 sensitive wildlife species have been documented by historical literature and databased in the Project area (refer to Table 4.3-3). Implementation of the Proposed Project on urban/developed land has a low potential to impact sensitive wildlife species because it provides little to no suitable habitat value for the sensitive wildlife species documented in the Proposed Project area. However, the ornamental trees and shrubs and structures present in the urban/developed land could provide potential overwintering habitat for monarch butterfly and suitable foraging and roosting habitat for sensitive bats documented in the Proposed Project area, including western mastiff bat. Direct impacts to the trees, shrubs, and structures in the urban/developed land of the Project area could result in direct impacts in the form of foraging, nesting, and roosting habitat loss.

The aquatic habitats present in the Proposed Project area including wetlands and streams, have the potential to provide suitable habitat for sensitive reptiles like southwestern pond turtle, and foraging, nesting, for sensitive bird species such as southwestern willow flycatcher, least Bell's vireo, and yellow-breasted chat.

The woodland and forest communities of cismontane woodland and riparian forest/scrub throughout the Proposed Project area support sensitive reptiles, birds, and mammals documented in the Proposed Project area, including but not limited to Blainville's (coast) horned lizard and red-diamond rattlesnake. If sandy and/or gravelly soils are present, these areas may have the potential to support western spadefoot.

The upland vegetation communities of annual grassland, chaparral, and coastal scrub present in the Proposed Project area provides suitable habitat for sensitive invertebrates, reptiles, birds, and mammals documented in the Proposed Project area. These sensitive wildlife species include monarch butterfly, grasshopper sparrow, coastal cactus wren, western burrowing owl, and California horned lark, among others. If sandy and/or gravelly soils are present, these areas may have the potential to support western spadefoot.

Although the disturbed and agricultural land throughout the Proposed Project area is unlikely to support most of the historically documented sensitive wildlife species, species like western burrowing owl have adapted to frequently use highly cultivated and disturbed areas such as agricultural lands for burrowing (if suitable burrows and soil conditions are available) and as movement corridors.

Impacts to the vegetation communities listed above are assumed to be significant without mitigation because they could result in impacts to sensitive wildlife species. Therefore, prior to impacts to sensitive vegetation communities that could support sensitive wildlife species, a biological survey would be required to be conducted as part of mitigation to determine the presence and potential for occurrence of sensitive wildlife species and to quantify potential impacts on these resources.

If the results of the biological survey determine that sensitive wildlife species are not present and do not have high potential to occur, direct impacts to sensitive wildlife species would be less than significant, and no further mitigation is required.

Alternatively, if the results of the biological survey determine that sensitive wildlife species are present or have a high potential due to available suitable habitat, direct impacts to sensitive wildlife species would be considered potentially significant without further mitigation.

Nesting Birds

The Proposed Project area provides potentially suitable nesting habitat for birds and raptors protected under the CFGC and MBTA. Focused nest surveys were not conducted due to the programmatic nature of the Proposed Project. If construction activities or other disruptive activities begin during the general bird and raptor nesting season (January 15 through September 15), the Proposed Project could result in potentially significant impacts without mitigation. Prior to impacts to potential nesting bird habitat in the Proposed Project area, a nesting bird survey would be required to implement regulations protecting sensitive nesting birds, including the CFGC and MBTA (Mitigation Measure MM BIO-7).

Sensitive Roosting Bats

As previously discussed, suitable roosting habitat for sensitive bat species, including western mastiff bat, occurs in the structures and trees throughout the Proposed Project area. Although no focused nighttime mist-netting or acoustic surveys were conducted, the availability of suitable roosting with nearby foraging habitat suggests that bats are likely roosting in the Proposed Project area. Therefore, if sensitive roosting bats are present, potential impacts would be considered potentially significant without mitigation.

Critical Habitat

Critical habitat for coastal California gnatcatcher occurs in the Proposed Project area (Figure 4.3-4). Potential impacts to this sensitive species in its designated critical habitat could occur during implementation of the Proposed Project and would be considered potentially significant without mitigation. Prior to impacts to coastal California gnatcatcher critical habitat in the Proposed Project area, a biological resources survey and habitat assessment would be required to implement regulations protecting critical habitat.

Like the discussion under Sensitive Wildlife Species, Direct Impacts, if the results of the biological survey determine that suitable habitat for coastal California gnatcatcher is not present, direct impacts to this sensitive species in its designated critical habitat would be less than significant, and no mitigation is required.

Alternatively, if the results of the biological survey determine that suitable coastal California gnatcatcher habitat is present, direct impacts to designated critical habitat for coastal California gnatcatcher would be considered potentially significant without mitigation.

Indirect Impacts

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash and garbage, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows, common ravens [*Corvus corax*], coyotes [*Canis latrans*], domestic dogs [*Canis familiaris*], raccoons [*Procyon lotor*], and striped skunks [*Mephitis mephitis*]). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the sensitive wildlife species historically documented in the Project area. These indirect impacts are project-specific and variable; therefore, potential indirect impacts resulting from the operation of individual projects facilitated by the Proposed Project would need to be addressed on a project-by-project basis through subsequent environmental review.

Like the discussion under Sensitive Wildlife Species, Direct Impacts, if the results of the biological survey determine that sensitive wildlife species are not present and do not have a high potential to occur, indirect impacts to sensitive wildlife species would be less than significant. Alternatively, if the results of the biological survey determine that sensitive wildlife species are present or have a high potential to occur due to available suitable habitat, indirect impacts to sensitive wildlife species could occur.

Similar to the Indirect Impacts discussion under the Sensitive Plant Species above, indirect impacts to sensitive wildlife species from hydrologic changes, including erosion, stormwater runoff, and pollution discharges, would be reduced through project compliance with the required NPDES Construction General Permit provisions. However, indirect impacts to sensitive wildlife species from lighting, increased human activity, and potential predation by mesocarnivores attracted by trash and garbage could result. Therefore, indirect impacts to sensitive wildlife during construction activities would be considered potentially significant without mitigation.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measures MM BIO-1 through MM BIO-7 is required.

Level of Significance After Mitigation: Less than significant.

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

Impact Analysis

Focused General Plan Update

Direct Impacts

A total of eight sensitive vegetation communities and three land cover types occur in the Proposed Project area, including freshwater, freshwater emergent wetland, non-vegetated channel, cismontane woodland, riparian forest/scrub, annual grassland, chaparral, coastal scrub, agricultural land, disturbed land, and urban/developed land. Construction activities in areas that contain sensitive vegetation communities could result in potential impacts to these sensitive vegetation communities.

Prior to impacts undeveloped areas occurring in the Proposed Project area, a biological survey shall be required to be conducted to determine the presence of sensitive vegetation communities and to quantify potential impacts on these resources.

If the results of the biological survey determine that sensitive vegetation communities are not present, direct impacts to sensitive vegetation communities would be less than significant, and no mitigation is required.

Alternatively, if the results of the biological survey determine that sensitive vegetation communities do occur, direct impacts to sensitive vegetation communities would occur and further mitigation would be required.

Impacts to the non-sensitive land cover types, agricultural land, disturbed land, and urban/developed land would not be considered significant or require habitat-based mitigation.

Indirect Impacts

Most of the indirect impacts to sensitive plant species described above in Threshold BIO-a: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. If the results of the biological survey required by Mitigation Measure MM BIO-1 for Threshold BIO-a determines that sensitive vegetation communities do not occur, indirect impacts to sensitive vegetation communities would be less than significant, and no further mitigation is required. Alternatively, if the results of the biological survey determine that sensitive vegetation communities are present, indirect impacts to sensitive vegetation communities could occur.

As previously discussed under Indirect Impacts in Threshold BIO-a, indirect impacts to sensitive vegetation communities from hydrologic changes, including erosion, stormwater runoff, and

pollution discharges would be reduced through project compliance with NPDES Construction General Permit provisions (including preparation and implementation of a Stormwater Pollution Prevention Plan and BMPs). Therefore, through compliance with these regulations, indirect impacts to sensitive vegetation communities during construction would be less than significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measures MM BIO-1 and MM BIO-3 through MM BIO-5 is required.

Level of Significance After Mitigation: Less than significant.

Brea Core Specific Plan

Direct and Indirect Impacts

The BCSP area is composed of one vegetation community (i.e., annual grassland) and three land cover types (i.e., agricultural land, disturbed land, and urban/developed land). Therefore, implementation of the BCSP in the areas of three land cover types would not result in a substantial adverse impact to any sensitive natural habitat. While development in or near the annual grassland could result in adverse impacts to special-status plant or wildlife species, the grassland area within the BCSP area is part of the southbound SR-57 off- and on-ramps, and would not be developed as part of land use changes proposed by the BCSP. Therefore, no direct impacts to grassland vegetation community within the BCSP area would occur, and the BCSP would not have a substantial adverse direct or indirect impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.3.4.3 Threshold BIO-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.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

Direct Impacts

Aquatic vegetation communities, including freshwater, freshwater emergent wetland, and non-vegetated channel occur in the Project area and may fall under the regulatory jurisdiction of the USACE, RWQCB, or CDFW (refer to Figure 4.3-1 and Figure 4.3-2). There are non-vegetated

channel and riparian forest/scrub within the BCSP area. Therefore, impacts to jurisdictional aquatic resources are assumed to be significant without mitigation.

If potentially jurisdictional aquatic resources are identified during the pre-project/activity biological resources survey conducted required by Mitigation Measure MM BIO-1 for Threshold BIO-a, a qualified biologist shall conduct a formal aquatic resources delineation.

If the results of the aquatics resources delineation determine that jurisdictional aquatic resources are not present, direct impacts to jurisdictional aquatic resources would be less than significant, and no further mitigation is required. Alternatively, if the results of the aquatics resources delineation determine that jurisdictional aquatic resources occur, direct impacts to jurisdictional aquatic resources would be potentially significant without further mitigation and additional mitigation would be required as outlined in Mitigation Measure MM BIO-9 to reduce impacts to less than significant.

Indirect Impacts

Most of the indirect impacts to sensitive plant species and sensitive vegetation communities described in Sections 4.3.4.1 and 4.3.4.2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. Like the discussion in these sections, if the results of the biological survey determine that impacts to jurisdictional aquatic resources would not occur, indirect impacts to jurisdictional aquatic resources would be less than significant, and no further mitigation is required. Alternatively, if the results of the biological survey determine that jurisdictional aquatic resources are present, indirect impacts to jurisdictional aquatic resources could occur.

Indirect impacts to jurisdictional aquatic resources from hydrologic changes, including erosion, stormwater runoff, and pollution discharges could occur during individual development project construction. However, compliance with NPDES CGP provisions (including preparation and implementation of a Stormwater Pollutant Prevention Plan and BMPs). Therefore, indirect impacts to jurisdictional aquatic resources during construction would be less than significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measures MM BIO-1, MM BIO-8, and MM BIO-9 is required.

Level of Significance After Mitigation: Less than significant.

4.3.4.4 Threshold BIO-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.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

Direct Impacts

As discussed in Section 4.3.1.2 under Wildlife Corridors and Habitat Linkages, the Proposed Project area is likely to be used as a wildlife movement corridor because it provides suitable nesting, foraging, nursery, and dispersal areas for both sensitive and common wildlife species due to the presence of native vegetation communities and its connection and proximity to the Puente-Chino Hills area, the Pacific Coast, as well the Santa Ana mountains to the south and the San Gabriel mountains to the north. There are numerous aquatic resources in and surrounding the Project area, which function as large-scale wildlife movement corridors for resident and migratory birds, large mammals, and aquatic species both locally and regionally. The cismontane woodland and riparian forest/scrub communities in the Proposed Project area in particular, are high-quality, contiguous sections of these habitats that support movement and linkages to other habitats along the Pacific Coast and through the mountains to the east for both local and migratory species. Although the residential and commercial development throughout much of the Project area has the potential to limit wildlife movement project-specific evaluation would be necessary determine project-level impacts. Although the BCSP area is fully developed, it includes small natural areas, non-vegetated channel, small segment of riparian forest/scrub, and agriculture lands, which could be used as a wildlife movement corridor.

As such, impacts to the wildlife corridors and habitat linkages are assumed to be significant without mitigation. Prior to impacts to potential wildlife corridors and habitat linkages, a biological survey shall be required to be conducted to determine the presence and potential for occurrence of these resources.

Thus, prior to individual project construction in areas that contain sensitive vegetation communities or those that could support wildlife corridors and habitat connectivity (such as agricultural land), a biological survey would be required to determine if the area is used as a wildlife corridor or linkage to other sensitive habitats.

If the results of the biological survey determine that wildlife corridors or habitat linkages are not present, direct impacts would be less than significant, and no further mitigation is required. Alternatively, if the results of the biological survey determine that wildlife corridors and habitat linkages are present, direct impacts would be considered potentially significant without further mitigation.

Indirect Impacts

Wildlife movement corridors and habitat connectivity would be impacted by many of the other indirect effects discussed previously for indirect impacts to sensitive wildlife species. Like the discussion under Sensitive Wildlife Species, Direct Impacts, if the results of the biological survey determine that wildlife corridors and habitat linkages are not present, indirect impacts to wildlife corridors and habitat linkages would be less than significant, and no mitigation is required. Alternatively, if the results of the biological survey determine that wildlife corridors and habitat linkages are present, indirect impacts to sensitive wildlife species could occur.

As previously discussed, indirect impacts to wildlife corridors and habitat linkages from hydrologic changes, including erosion, stormwater runoff, and pollution discharges, would be reduced through project compliance with NPDES Construction General Permit provisions. However, indirect impacts to wildlife corridors and habitat linkages from lighting and increased human activity could result. Therefore, indirect impacts to wildlife corridors and habitat linkages would be considered potentially significant without mitigation.

As previously stated, if wildlife corridors and habitat linkages are identified, development of the Proposed Project area could result in potentially significant direct and indirect impacts to wildlife corridors and habitat linkages in the Project area.

Level of Significance Before Mitigation: Potentially significant (wildlife corridors and habitat linkages).

Mitigation Measures: Implementation of Mitigation Measures MM BIO-1 and MM BIO-3 through BIO-6 would be required.

Level of Significance Before Mitigation: Less than significant.

4.3.4.5 Threshold BIO-e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

As discussed in Sections 4.3.4.1 through 4.3.4.4, the Proposed Project's potential impacts to sensitive plant and wildlife species, sensitive vegetation communities, jurisdictional aquatic resources, and wildlife corridors and habitat linkages would be potentially significant without mitigation. However, implementation of Mitigation Measures MM BIO-1 through MM BIO-9 would fully mitigate for potential impacts to these resources. Additionally, the Focused GPU's Community Resources Element provides policies that would protect sensitive plant and wildlife species, critical habitat, and sensitive vegetation communities in the Proposed Project area. Some of the policies include supporting efforts to identify and conserve suitable habitats, minimizing

invasive plant species' impact on local ecosystems, and encouraging preservation of critical wildlife corridors and habitat connectivity. The updated Community Resources Element also includes action items to support the policies. The policies and actions related to biological resources are included in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, of this PEIR.

With incorporation of Mitigation Measures MM BIO-1 through MM BIO-9, implementation of the Proposed Project would not result in significant impacts to protected biological resources, and the Proposed Project would not conflict with any local policies or ordinances protecting biological resources.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: See previously identified Mitigation Measure BIO-1 through BIO-9.

Level of Significance Before Mitigation: Less than significant.

4.3.4.6 Threshold BIO-f: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

The Proposed Project area is not within an adopted Habitat Conservation Plan and is not subject to the NCCP program or other regional conservation plan. Therefore, no impacts to local or regional conservation plans would occur from implementation of the Proposed Project, and no protection measures are required.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.3.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to biological resources that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

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

Focused General Plan Update and Brea Core Specific Plan

Cumulative projects within the vicinity of the Proposed Project area would have the potential to result in impacts to sensitive plant and wildlife species, including loss of habitat.

The remaining areas within Orange County, as well as adjacent and nearby jurisdictions, including Los Angeles County to the north, San Bernardino County and Riverside County to the east, and San Diego County to the south, would be required to comply with applicable Federal and State regulations that provide protections for sensitive plant and wildlife species, such as the FESA, CESA, and the California NCCP Act. In addition, some projects that impact sensitive species require approval from the USFWS and CDFW. As with the Proposed Project, if significant impacts occur from particular cumulative projects, then appropriate mitigation measures would also required by other jurisdictions to reduce impacts to the extent feasible in compliance with CEQA.

As with the Proposed Project, other cumulative projects in the region would be required to implement project-specific mitigation measures and obtain applicable approval from the CDFW and/or USFWS to reduce the project's impacts to sensitive plant and wildlife species. Therefore, the Proposed Project's contribution to impacts on sensitive plant and wildlife species would not be cumulatively considerable with mitigation.

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

Focused General Plan Update and Brea Core Specific Plan

Cumulative projects in the vicinity of the Proposed Project area would have the potential to result in impacts associated with riparian habitat and other sensitive natural communities through direct and indirect loss or degradation.

The remaining areas within Orange County, as well as adjacent and nearby jurisdictions, including Los Angeles County to the north, San Bernardino County and Riverside County to the east, and San Diego County to the south, would be required to comply with applicable Federal and State regulations such as the California Lake and Streambed Alteration Program or the California NCCP Act. These programs provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the

USFWS and CDFW. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible.

As discussed under Threshold BIO-b, development of the Proposed Project area would have the potential to impact sensitive vegetation communities. However, projects reviewed and approved within the City's jurisdiction would be required to implement project-specific evaluation and mitigate the project's impacts to riparian habitat or other sensitive communities to below a level of significance. Therefore, individual project's contribution to impacts on riparian habitat and other sensitive natural communities would not be cumulatively considerable with mitigation.

4.3.5.3 Cumulative Threshold BIO-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.

Focused General Plan Update and Brea Core Specific Plan

Cumulative projects located in the vicinity of the Proposed Project area would have the potential to result in a cumulative impact associated with Federally or State protected aquatic resources.

The remaining areas within Orange County, as well as adjacent and nearby jurisdictions, including Los Angeles County to the north, Riverside County to the east, and San Diego County to the south, would be required to comply with applicable Federal and State regulations such as the California Lake and Streambed Alteration Program, Sections 401 and 404 of the CWA, and the Porter-Cologne Act.

Existing regulations would ensure that a significant cumulative impact associated with Federally or State protected aquatic resources would not occur. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts as required to meet the regulatory agency's no-net-loss standard. As discussed under Threshold BIO-c, above, the Proposed Project would avoid impacts to jurisdictional aquatic resources to the greatest extent feasible, providing compensatory mitigation at an approved ratio for unavoidable impacts, and would not contribute to cumulative impacts to jurisdictional aquatic resources as a result. Projects in the City and in surrounding cities are required to comply with existing regulatory requirements and obtain applicable permits from the USACE, RWQCB, and CDFW. Therefore, the Proposed Project would not result in cumulatively considerable impacts with mitigation.

4.3.5.4 Cumulative Threshold BIO-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.

Focused General Plan Update and Brea Core Specific Plan

Cumulative projects located within the vicinity of the Proposed Project area would have the potential to result in a cumulative impact associated with wildlife movement corridors and habitat linkages.

The remaining areas within Orange County, as well as adjacent and nearby jurisdictions, including Los Angeles County to the north, Riverside County to the east, and San Diego County to the south, would be required to comply with applicable Federal and State regulations such as the California NCCP Act, which supports the continued provision of wildlife movement corridors. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible.

As discussed under Threshold BIO-d, above, the Proposed Project would have the potential to impact wildlife corridors or habitat linkages. Individual projects facilitated by the Proposed Project would be required to implement project-specific mitigation measures to reduce impacts to wildlife corridors or habitat linkages to below a level of significance. Therefore, the Proposed Project would not contribute to a cumulatively significant impact with mitigation.

4.3.5.5 Cumulative Threshold BIO-e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Focused General Plan Update and Brea Core Specific Plan

Cumulative projects located in the vicinity of the Proposed Project area would have the potential to result in a cumulative impact associated with conflicts with local policies or ordinances.

The remaining areas within Orange County, as well as adjacent and nearby jurisdictions, including Los Angeles County to the north, Riverside County to the east, and San Diego County to the south, would be required to comply with applicable local policies or ordinances. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible.

As discussed under Threshold BIO-e, above, individual development projects would be required to comply with local policies and ordinances protecting biological resources in the Focused GPU. A significant cumulative impact associated with a conflict with a local policy or ordinance would not occur. Therefore, the Proposed Project, in combination with other cumulative projects, would not result in a significant cumulative impact. The Proposed Project's contribution would not be cumulatively considerable with mitigation.

4.3.5.6 Cumulative Threshold BIO-f: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Focused General Plan Update and Brea Core Specific Plan

As discussed in Section 4.3.4.6, the Proposed Project area is not within an adopted Habitat Conservation Plan and is not subject to the NCCP program or other regional conservation plan. Therefore, the Proposed Project, in combination with other cumulative projects, would not result in a significant cumulative impact from conflicts with regional conservation plans. The Proposed Project's contribution would not be cumulatively considerable. No mitigation measures are required.

4.3.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds BIO-a through BIO-e are potentially significant without mitigation even with compliance with all applicable regulatory requirement as outlined in PPP BIO-1 through PPP BIO-4.

Without mitigation, environmental impacts related to Threshold BIO-f would be less than significant, and no mitigation measures are required.

4.3.7 Mitigation Measures

Sensitive Plant

MM BIO-1 **Pre-project/Activity Biological Resources Survey/Habitat Assessment.** For project sites within vegetation communities and land covers other than "Urban/Developed," as shown on Figure 4.3-2, Vegetation Communities and Land Cover Types, of this Program Environmental Impact Report for the Brea 2050: Focused General Plan Update and Brea Core Specific Plan, the following requirements shall apply.

Prior to the issuance of any clearing, grading, or construction permits for individual development projects that are not exempt from California Environmental Quality Act (CEQA), and in conjunction with any required CEQA review, the future project applicant shall submit one or more documents to the City of Planning Division for review and approval, demonstrating that the project site does not contain native vegetation, sensitive plants, or undisturbed soils. Examples of acceptable documentation include, but are not limited to, the following:

- Aerial photographs (historic and current) showing grading, building footprints, paving, and landscaped areas over time to support ornamental status, existing landscape plans.
- Photographic documentation consisting of georeferenced or dated photographs.

- Landscaping plans or as-built drawings demonstrating that vegetation was intentionally planted as part of site development.
- Field survey results prepared by a qualified biologist confirming that existing plant species are ornamental and non-native.

Within the future site-specific project areas exhibiting native vegetation, a site-specific biological resources survey shall be conducted during the project design phase.

The biological resources survey and habitat assessment shall be conducted by a qualified biologist and shall include but not be limited to the following:

- An analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the Proposed Project vicinity.
- A review of current land use and land ownership within the project vicinity.
- An assessment and mapping of vegetation communities present within the project vicinity. If vegetation community mapping has not been conducted on the site in the previous three years, updated vegetation mapping shall be conducted by a qualified biologist as part of the project planning and environmental review process. Vegetation communities shall be mapped according to the Manual of California Vegetation at the alliance level, and a crosswalk table with Holland vegetation communities shall be provided.
- A general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site.
- An evaluation of potential local and regional wildlife movement corridors.
- A focused habitat assessment to determine if the project site supports vegetation communities that may provide habitat for plant or wildlife species, to be conducted by a qualified biologist, to determine the potential for sensitive plant or wildlife species to occur in or adjacent to the project site.
- If the project site supports sensitive vegetation communities, the project proponent shall implement the following weed control methods to minimize the establishment and spread of non-native and invasive weed species in the project site during construction activities:
  - Seeds and plant materials used for revegetation shall be certified weed-free.
  - Straw materials, such as those used for erosion control, shall be certified weed-free.

The results of the biological survey shall be presented in a biological technical report. The survey report shall map and describe the location and extent of observed sensitive

resources, including sensitive vegetation communities, plant, and wildlife species within the areas of potential direct and indirect effects for each project area, direct and indirect impacts associated with construction and operation of a project, and the need for further survey, monitoring, or mitigation, including measures pursuant to Mitigation Measures MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, and MM BIO-7 of this Program Environmental Impact Report.

MM BIO-2: **Focused Sensitive Plant Species Surveys.** If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat, to determine presence/absence of sensitive plant species on the project site. Focused sensitive plant surveys shall be conducted during the species' specific blooming periods to determine presence/absence. If sensitive plant species are mapped within any proposed construction, access, or staging areas, these species shall be quantified and flagged, and these areas shall be modified to avoid direct impacts to mapped sensitive plant species. If significant impacts to these species are unavoidable, the impact on these species shall be reduced to a less than significant level through implementation of one or a combination of the following actions, in accordance with a Conceptual Restoration Plan or acquisition of mitigation credits, reviewed and approved by the City of Brea:

- Impacted plants shall be salvaged and relocated to suitable habitat in an on-site restoration area, if possible. If relocation to a restoration area is not practical, the plants shall be relocated off-site to an appropriate location determined by a qualified biologist.
- Seeds from impacted plants shall be collected for use at a local off-site location, as applicable.
- Off-site habitat that supports the species impacted shall be enhanced or supplemented with seed collected on site.
- Comparable habitat at an approved off-site location shall be determined by a qualified biologist and preserved for relocation, enhancement, or transplant of the impacted sensitive plants.

Mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include all the following:

- Conceptual planting plan prepared by a qualified biologist including grading, planting specifications, and, if appropriate, temporary irrigation.
- Planting specifications and fencing and signage to discourage unauthorized access of the planting site.

- Monitoring program prepared by a qualified biologist with clearly stated goals and objectives and well-defined performance standards that result in no net loss of sensitive plant resources. Final success criteria shall be determined based on quality, quantity, and species of plant impacted and in consultation with California Department of Fish and Wildlife and U.S. Fish and Wildlife Service depending on the status of the species. The monitoring program will include measures for adaptive management detailing remedial actions if success criteria are not met in the monitoring time frame. Remedial actions may include, but are not limited to, supplemental water, replanting, and herbivore deterrents/protections.

MM BIO-3 **Sensitive Vegetation Communities Impacts Mitigation.** If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, a biological survey shall be conducted to ground-truth and/or update vegetation communities. Any direct impacts to sensitive vegetation communities require mitigation to comply with California Department of Fish and Wildlife authorizations, as well as the ratios defined in any State or Federal permit(s) issued for the project.

Potential direct impacts to sensitive vegetation communities resulting from project implementation shall be mitigated prior to any vegetation clearing or ground-disturbing activities within the site-specific areas through one of the following three options:

a. Vegetation communities and land cover types will be verified in the field during the required biological survey and will be mapped for impact analysis;
b. Compensatory mitigation for sensitive habitats shall be satisfied through the acquisition of mitigation bank credits via a resource agency-approved mitigation site within the site's specific watershed or by acquisition of other off-site mitigation credits to be identified and selected in coordination with CDFW. Prior to implementation of project construction impacts (e.g., vegetation clearing or ground-disturbing activities) that would require compensatory mitigation, documentation demonstrating the availability of mitigation credits (i.e., credit ledger) at the approved mitigation site must be submitted to the City of Brea for confirmation; or
c. If credits are not available at a resource agency-approved mitigation site within the site's specific watershed or through other off-site mitigation credits, implementation of habitat creation, restoration, enhancement, or preservation shall occur through a Habitat Mitigation and Monitoring Plan developed by a qualified biologist. Under this option, a Habitat Mitigation and Monitoring Plan shall be

provided and prepared to achieve no net loss of the resource, be timed in relation to project impacts, and comply with Federal and State mitigation requirements.

When proposed mitigation involves habitat enhancement, restoration or creation, the Habitat Mitigation and Monitoring Plan shall include all of the following information:

- Conceptual planting plan including planting zones, grading, and irrigation.
- Seed mix/planting palette.
- Planting specifications.
- Monitoring program prepared by a qualified biologist including success criteria that ensure no net loss of sensitive vegetation communities. Final success criteria shall be determined based on quality, quantity, and type of habitat impacted and in consultation with CDFW. The monitoring program shall include measures for adaptive management plan detailing remedial actions if success criteria are not met in the monitoring time frame. Remedial actions may include, but are not limited to, supplemental water, replanting, and herbivore deterrents/protections.

For mitigation that involves habitat acquisition, the Habitat Mitigation and Monitoring Plan shall include all the following:

- Location of proposed acquisition.
- Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact.
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity.

The identification of mitigation site credits shall be provided to the City of Brea and shall include the following:

- Location of approved mitigation site.
- Description of the mitigation credits to be acquired, including substantial evidence that the acquired habitat mitigates for the specific maintenance impact.
- Documentation of the credits that are associated with a mitigation bank, which has been approved by the appropriate resource agencies.
- Documentation in the form of a current mitigation credit ledger.

MM BIO-4: **Habitat Restoration for Temporary Impacts.** If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, temporary impact areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate, following disturbance and prior to project

completion. Habitat restoration and erosion control treatments shall be installed within these short-term impact areas. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence and microplastic- and weed-free straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained by a qualified biologist or restoration specialist for 25 months to ensure adequate establishment and sustainability of the plantings/seedings.

Where a project activity involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed immediately, where feasible, and the removal shall be monitored by the qualified monitoring biologist to ensure that dispersal of propagules (e.g., seeds and stems) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the qualified monitoring biologist. Where aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a licensed pest control advisor, using chemicals permitted as safe within aquatic environments.

Sensitive Wildlife Species

MM BIO-5: **Qualified Monitoring Biologist.** If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, a qualified monitoring biologist shall be retained to implement required monitoring. The qualified monitoring biologist shall be responsible for the following monitoring and reporting tasks:

a. **Biological Construction Mitigation/Monitoring Exhibit.** Prior to the start of construction within the future site-specific project areas that have potential to contain sensitive biological resources, the qualified monitoring biologist shall submit a Biological Construction Mitigation/Monitoring Exhibit, which includes limits of work, proposed monitoring schedule, bird, focused sensitive species, or other wildlife surveys/survey schedules (including general bird nesting and U.S. Fish and Wildlife Service protocol), timing of surveys, bird construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the qualified monitoring biologist. The Biological Construction Mitigation/Monitoring Exhibit shall include the construction site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule for construction activities. Where the potential for impacts to biological resources is limited (e.g., construction within a footprint that consists entirely of previously

developed or disturbed lands), the Biological Construction Mitigation/Monitoring Exhibit may be limited to a pre- and post-maintenance verification inspection by a qualified biologist. For highly sensitive resource areas with documented sensitive biological and aquatic resources present, full-time biological monitors may be required, as determined by a qualified biologist. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by the City of Brea prior to the start of construction.

b. **Resource Marking/Protection.** Prior to the start of construction activities within the future site-specific project area, the qualified monitoring biologist shall supervise the placement of orange construction fencing or similar visible marker, staking, or flagging along the limits of the construction area adjacent to sensitive biological habitats, as shown on the Biological Construction Mitigation/Monitoring Exhibit to ensure crews remain within the approved construction limits. These demarcations shall not be required for areas with existing barriers, such as chain-link fencing, along the limits or facilities that are within or adjacent to developed and non-sensitive habitat areas. This task shall include flagging plant specimens and delineating buffers to protect sensitive biological resources (e.g., habitats, sensitive plant and wildlife species, including nesting birds) prior to construction.

c. **Cover Trenches.** The qualified monitoring biologist shall oversee the construction site so that cover and escape routes for wildlife from excavated areas shall be provided daily. All trenches, holes, and excavations during construction shall be covered at night as directed by the monitoring biologist with plywood, metal plates, or other means, and if plastic sheeting is used, the edges must be covered with soils such that small wildlife cannot access the excavated hole. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and before sealing the exposed area) by the qualified monitoring biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. The qualified monitoring biologist shall verify that the contractor has covered all steep-walled trenches or excavations prior to the end of construction daily. If wildlife species are encountered within any trenches or excavated areas, the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape (e.g., a ramp or sloped surface at no greater than a 30-degree angle) and allow the species to disperse. In addition, the qualified monitoring biologist shall

provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and equipment and to use best judgment to avoid killing or injuring wildlife (refer to Mitigation Measure BIO-5e).

d. **Structure and Tree Clearance.** Prior to the issuance of any permit to allow for the removal or demolition of trees and existing structures within the survey area (particularly any ornamental trees and existing buildings in the developed land areas), the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season), the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allow the species to disperse. If tree-roosting bats are suspected, slow removal by gently pushing the tree over with heavy equipment is required.

e. **Pre-Construction Meeting/Education.** Prior to the start of any construction activity where the site plan for the construction area indicates that significant impacts to biological resources may occur, as determined by a qualified biologist, a pre-construction meeting shall be held on site with the following in attendance: City of Brea representative (project planner and building inspector), the construction contractor (if applicable), and the qualified monitoring biologist. At this meeting, the qualified monitoring biologist shall identify and discuss the construction protocols that apply to the proposed activities and the sensitive nature of the adjacent habitat with appropriate project personnel.

   At the pre-construction meeting, the qualified monitoring biologist shall submit to the City of Brea representatives and construction contractor a copy of the Biological Construction Mitigation/Monitoring Exhibit that identifies areas to be protected, fenced, and monitored. This data shall include all buffer limits, if applicable.

   Prior to the start of construction activities, the qualified monitoring biologist shall meet with the construction contractor and crew and conduct an on-site educational session regarding the need to avoid impacts outside the approved construction footprint and to protect sensitive plants and wildlife that may occur at the specific facility. This may include but not be limited to explanations of the bird and wetland buffers, the flag system for removal of invasive species or retention of sensitive plants, and clarification of acceptable access routes/methods and staging areas.

f. **Biological Monitoring and Reporting.** The qualified monitoring biologist with stop work authority shall inspect/monitor the project construction area in accordance with the approved Biological Construction Mitigation/Monitoring Exhibit. This may be limited to pre- and post-maintenance inspections, weekly

visits, or full-time monitoring, as determined by the qualified monitoring biologist and the City of Brea.

The qualified monitoring biologist shall document monitoring events via a Consultant Site Visit Record. This record shall be sent to the City of Brea project manager each month. However, if weekly reports are submitted as part of a separate agency permit requirement, these reports may be forwarded to the City of Brea in place of Consultant Site Visit Record submittals.

If no deviations from the construction site plan occur during maintenance, no additional documentation is required. However, if deviations from the site plan do occur, such as unanticipated impacts to sensitive vegetation communities or unanticipated discharge of pollutants, a Final Monitoring Report shall be prepared within 3 months following the completion of mitigation monitoring detailing maintenance and monitoring that occurred, and any remedial or compensatory measures taken.

MM BIO-6: **Focused Sensitive Wildlife Species Surveys.** If recommended by the Biological Resources Survey/Habitat Assessment prepared pursuant to Mitigation Measure MM BIO-1, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat, to determine presence/absence of sensitive wildlife species within the proposed survey area. If sensitive wildlife species or their habitat are present or potentially present based on biological surveys, the following measures shall be implemented.

a. **Crotch's Bumble Bee.** Habitat assessment surveys for California Endangered Species Act (CESA) candidate bumble bee species, with a focus on Crotch's bumble bee, followed the California Department of Fish and Wildlife (CDFW) methodology from the Survey Considerations for CESA Candidate Bumble Bee Species dated June 6, 2023 (CDFW Survey Considerations) (CDFW 2023). If no Crotch's bumble bees are found during the focused surveys, but the habitat assessment identified suitable nesting, foraging, or overwintering habitat on the project site, recommendations outlined in the CDFW Survey Considerations will be followed, including recommendations that a biological monitor be on site during vegetation or ground-disturbing activities that take place during any of the Queen and Gyne Flight Period and Colony Active Period. If Crotch's bumble bees are observed, project proponents may propose site-specific measures to avoid take, or consult with CDFW to obtain an Incidental Take Permit (ITP) if take of CESA-protected bumble bees may occur during project activities.
b. **Western Spadefoot and Monarch Butterfly.** If western spadefoot or monarch butterfly become listed prior to implementation of future site-specific

development projects, focused surveys and consultation with the U.S. Fish and Wildlife Service (USFWS) would be necessary.

c. **Western Burrowing Owl.** If suitable habitat for western burrowing owl is present (annual grassland and agricultural land), a qualified biologist shall conduct focused surveys of the site and a 500-foot buffer, as access allows. If no burrowing owls are identified, no further measures are necessary. If burrowing owls are detected, active burrows shall be avoided using buffers outlined in the Staff Report on Burrowing Owl Mitigation, dated March 7, 2012, issued by CDFW. If avoidance is not possible, the qualified biologist shall consult with CDFW. No direct disturbance to burrowing owls or their occupied habitat shall occur without appropriate authorization from CDFW.

d. **Least Bell's Vireo.** If suitable habitat for least Bell's vireo is present and clearing, grubbing, grading, or other construction activities may occur between March 15 and September 15, the breeding season of the least Bell's vireo, a qualified biologist shall conduct focused surveys for the presence of the least Bell's vireo of the site and areas of potentially suitable habitat within 300 feet or that would be subject to construction noise levels exceeding 60 A-weighted decibels or to the ambient noise level if it already exceeds 60 A-weighted decibel hourly average. If present, measures to minimize noise impacts (such as temporary noise walls/berms) may be required. Noise levels from construction activities during the avian breeding season should not exceed 60 decibels (dBA Leq; or the ambient noise level if they already exceed 60 dBA Leq) at the edge of the occupied habitat. If complete avoidance is not feasible, the qualified biologist shall consult with USFWS. No direct harm to the species shall be allowed without appropriate authorization from USFWS.

e. **Southwestern Willow Flycatcher.** If suitable habitat for southwestern willow flycatcher is present and clearing, grubbing, grading, or other construction activities may occur between April 15 through September 15, the breeding season of the southwestern willow flycatcher, a qualified biologist shall conduct focused surveys for the presence of the southwestern willow flycatcher of the site and areas of potentially suitable habitat within 500 feet. If the species is determined to be present, consultation per Endangered Species Act with USFWS would be necessary and no activities would occur until authorized by USFWS. No direct harm to the species shall be allowed without appropriate authorization from USFWS.

f. **Sensitive Bat Species.** If suitable roosting habitat (e.g., riparian habitat, snags, wooden buildings, bridges, etc.) for sensitive bat species is present, a qualified biologist shall conduct subsequent focused surveys no less than 14 days prior to removal or disturbance of vegetation or buildings. The survey shall consist

of visual and/or acoustic methods as deemed appropriate by the qualified biologist. If no bats are detected, no further measures are necessary. If bat species are detected during surveys, a site-specific plan shall be developed by the qualified biologist. The plan may include, as determined by the qualified biologist, delaying removal of roost habitat until after the maternity roosting period and exclusion of bats from roosting habitat prior to removal of habitat. The qualified biologist shall consult with CDFW prior to implementing any exclusion activities.

g. **Other Sensitive Species.** Prior to any demolition work, construction, or grading activities within the future site-specific project areas, pre-construction surveys for other sensitive wildlife species, such as reptiles, may be required to determine presence/absence of sensitive wildlife species within the proposed survey area.

MM BIO-7: **Focused Nesting Bird Surveys.** Project activities that may directly (e.g., vegetation removal, clearing and grubbing, building demolition) or indirectly affect (noise, light, or ground vibration) nesting raptors and other protected avian species shall be timed to avoid the nesting season (January 15 through September 15). If project activities occur within the nesting season, the qualified monitoring biologist shall conduct focused surveys for birds in suitable habitat to determine presence/absence. Surveys shall occur within seven (7) days prior to any construction or grading activities within the future site-specific project areas. Focused sensitive bird surveys shall be conducted during the species' specific nesting seasons to determine presence/absence within the development footprint plus a buffer, if recommended by the qualified monitoring biologist (refer to Mitigation Measure MM BIO-5). The survey report shall map and describe the location and extent of observed sensitive bird species that would be impacted within the areas of potential effect for each project area. If no nesting birds are documented within the individual activity area, construction shall be allowed to proceed. If nesting birds cannot be completely avoided, a no-disturbance buffer shall be established around the active nest, the size of which will be determined by the qualified monitoring biologist based on species of bird and specific construction activities to take place. The size of the buffer can be reduced in consultation with California Department of Fish and Wildlife. Any work within the buffer shall be avoided until the nest is inactive, as determined by the qualified monitoring biologist.

Aquatic Resources

MM BIO-8 **Aquatic Resources Delineation.** If potentially jurisdictional aquatic resources are identified during pre-project/activity surveys pursuant to Mitigation Measure MM

BIO-1, a qualified biologist shall conduct a formal aquatic resources delineation following the methods outlined in the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual and applicable Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual to map the extent of wetlands and non-wetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in an aquatic resources delineation report. The aquatic resources delineation report shall be used in consultation with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife for necessary authorization or permit, as described in Mitigation Measure MM BIO-9.

MM BIO-9 **Potentially Jurisdictional Aquatic Resources Permitting.** Temporary and permanent impacts to the wetland and non-wetland waters potentially under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, shall be authorized by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, as applicable. Approved temporary and permanent impacts to the potentially Federal and State jurisdictional aquatic resources in the project area require compensatory mitigation through proposed on- or off-site habitat restoration, creation, or enhancement to the satisfaction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife to achieve a no-net loss of Federal and State jurisdictional wetland and non-wetland waters.

4.3.8 Level of Significance After Mitigation

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

Implementation of Mitigation Measures MM BIO-1 and MM BIO-2 would reduce potentially significant impacts to sensitive plant species through conducting sensitive plant species-focused surveys prior to individual project-level development. Direct impacts to vegetation communities potentially occupied by sensitive plant species would be conserved or restored through the implementation of Mitigation Measures MM BIO-3 and MM BIO-4.

Implementation of Mitigation Measure MM BIO-5 would reduce potentially significant impacts to sensitive wildlife species through monitoring by a qualified biologist prior to and during individual project-level development construction. Implementation of Mitigation Measures MM BIO-6 and MM BIO-7 would reduce potential direct impacts to sensitive wildlife species through conducting sensitive bird and wildlife species-focused surveys prior to construction.

Therefore, implementation of Mitigation Measures MM BIO-1 through MM BIO-7 would fully mitigate impacts to special status species, and no significant and unavoidable impacts would remain.

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

Implementation of Mitigation Measures MM BIO-3 through BIO-5 would reduce potentially significant impacts to sensitive vegetation communities through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted ones. Therefore, impacts to riparian habitats and other sensitive natural community would be fully mitigated, and no significant and unavoidable impacts would remain.

Threshold BIO-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.

Implementation of Mitigation Measures MM BIO-3 through MM BIO-5 would reduce potentially significant impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and restoring temporary impact areas. Furthermore, implementation of Mitigation Measures MM BIO-8 and MM BIO-9 would further reduce impacts to jurisdictional aquatic resources through conducting an aquatic resources delineation and obtaining resource agency permits. These mitigation measures would fully mitigate impacts to aquatic resources, and no significant and unavoidable impacts would remain.

Threshold BIO-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.

Implementation of Mitigation Measures MM BIO-1 and MM BIO-3 through MM BIO-6 would reduce potentially significant impacts to wildlife corridors and habitat linkages through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, creating new vegetation communities and restoring impacted ones, and conducting sensitive bird and wildlife species-focused surveys prior to construction. These mitigation measures would fully mitigate impacts to wildlife corridors and habitat linkages, and no significant and unavoidable impacts would remain.

Threshold BIO-e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Implementation of Mitigation Measures MM BIO-1 through BIO-9 would reduce potentially significant impacts to biological resources through conducting pre-construction surveys, focused sensitive plant and wildlife species surveys, focused bird species surveys, requiring sensitive vegetation communities impacts mitigation, habitat restoration for temporary impacts, a qualified

monitoring biologist during construction, conducting an aquatic resources delineation, and obtaining resource agency permits. These mitigation measures would fully mitigate impacts to biological resources, and no significant and unavoidable impacts would remain.

4.4 Cultural Resources

This section evaluates the potential for impacts on cultural resources resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.4.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to cultural resources.

4.4.1.1 Regulatory Setting

The treatment of cultural resources is governed by Federal and State laws and guidelines. Specific criteria exist to determine if prehistoric and historic sites or objects are significant or protected by law. Federal and State significance criteria generally focus on the resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State criteria. The laws and regulations seek to mitigate impacts to significant prehistoric or historical resources. The Federal and State laws and guidelines for protecting historical resources are summarized below.

Federal

National Historic Preservation Act (U.S. Code, Title 54, Section 300101 et seq.)

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for their historical significance at the local, State, or national level. Listing in the NRHP provides recognition that a property is significant to the nation, the State, or the community and assumes that Federal agencies consider historical value in the planning for Federal and Federally assisted projects. Properties listed in the NRHP or determined eligible for listing must meet certain criteria for historical significance and possess integrity of form, location, and setting. Structures and features must usually be at least 50 years old to be considered for listing in the NRHP, barring exceptional circumstances. Criteria for listing in the NRHP, which are set forth in the Code of Federal Regulations, Title 36, Part 60.4, are as follows: the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or
B. Are associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the criteria and exhibit integrity, which is measured by the degree to which the resource retains its historic properties and conveys its historic character, the degree to which the original fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the California Environmental Quality Act (CEQA) Guidelines.

Native American Graves Protection and Repatriation Act (U.S. Code, Title 25, Section 3001 et seq.)

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 provides a process for museums and Federal agencies to return certain Native American cultural items—human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants and culturally affiliated Native American Tribes and Native Hawaiian organizations. NAGPRA includes provisions for unclaimed and culturally unidentifiable Native American cultural items, intentional and inadvertent discovery of Native American cultural items on Federal and Tribal lands, and penalties for noncompliance and illegal trafficking.

Federal curation regulations are also provided in the Code of Federal Regulations (CFR), Title 36, Part 79, and apply to collections that are excavated or removed under the authority of the Antiquities Act, the Reservoir Salvage Act, Section 110 of the National Historic Preservation Act, or the Archaeological Resources Protection Act. Such collections generally include those that are the result of a prehistoric or historical resources survey, excavation, or other study conducted in connection with a Federal action, assistance, license, or permit.

Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) provide professional guidance for preserving, rehabilitating, restoring, and reconstructing historic buildings, structures, sites, objects, and districts. The standards establish best practices to protect the historic character, materials, workmanship, and setting of cultural resources while allowing for their continued use. Although not regulatory by themselves, the standards are widely used by Federal, State, and local agencies to evaluate the appropriateness of proposed alterations to historic properties and to ensure that project actions avoid or minimize adverse effects to historic resources consistent with CEQA and Section 106 of the National Historic Preservation Act requirements.

State

California Government Code, Sections 6254(r) and 6254.10

Sections 6254(r) and 6254.10 of the California Government Code were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another State agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a State or local agency."

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a State government program for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHR is the authoritative guide to the State's significant historical and archaeological resources and encourages public recognition and protection of resources of architectural, historic, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protections under CEQA.

The term "historical resource" includes but is not limited to any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (California Public Resources Code, Section 5020.1[j]). Historical resources may be designated as such through three different processes:

- Official designation or recognition by a local government pursuant to local ordinance or resolution (California Public Resources Code, Section 5020.1[k])
- A local survey conducted pursuant to California Public Resources Code, Section 5024.1(g)
- Listing in or eligibility for listing in the NRHP (California Public Resources Code, Section 5024.1[d][1])

To be eligible for listing in the CRHR, a building must satisfy at least one of the following four criteria:

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

Native American Historic Cultural Sites (California Public Resources Code, Section 5097 et. seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to one year in jail to deface or destroy a Native American historic or cultural site that is listed or may be eligible for listing in the CRHR.

Mills Act Program

The Mills Act (California Government Code, Sections 50280–50290) is a State-enabling program that allows local governments to enter into contracts with owners of qualified historic properties to encourage preservation. Under a Mills Act contract, property owners agree to rehabilitate, maintain, and preserve the historic character-defining features of their property in exchange for a reduction in assessed property taxes. Although participation is voluntary and administered at the local level, the program provides an important incentive for long-term stewardship of historic resources and supports compliance with preservation goals and standards within a jurisdiction.

The City of Brea has Mills Act Contract Guidelines that helps owners of qualified historic property. As of March 2024, there are 20 properties under Mills Acts contracts in the City.

Assembly Bill 978: California Native American Graves Protection and Repatriation Act

The California NAGPRA, enacted in 2001, required the State agencies and museums that receive State funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. California NAGPRA also provides a process for the identification and repatriation of these items to the appropriate Tribes.

California Health and Safety Code, Section 7050.5, and California Public Resources Code, Section 5097.9

California Health and Safety Code, Section 7050.5, addresses the protection of human remains discovered in any location other than a dedicated cemetery and makes it a misdemeanor for any person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in California Public Resources Code, Section 5097.99. It further states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains will occur until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions concerning investigation of the circumstances, manner, and cause of any death and that the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to their authorized representative, in the manner provided in California Public Resources Code, Section 5097.98. If the county coroner determines that the remains are not subject to their authority and if the county coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, they shall contact, by telephone and within 24 hours, the NAHC. Whenever the NAHC receives notification of a discovery of Native American human remains from the county coroner, the agency shall immediately notify the most likely descendant if it believes them to be the most likely descendant of the deceased Native American. The most likely descendant may inspect the site of the discovery and make recommendations on the removal or reburial of the remains.

Local

The City of Brea generally defers to the provisions of CEQA for issues related to cultural resources. Specific mitigation measures for cultural resources (paleontological and archaeological) can be found in Section 3.7 of the 2003 Brea General Plan and are summarized below:

1. City staff may require development permit applicants to provide studies that document the presence/absence of archaeological and/or paleontological resources. Studies will be required in areas with documented or inferred resource presence. On properties where resources are identified, such studies shall provide a detailed mitigation plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified specialist.
2. All archaeological resources shall be subject to the provisions of CEQA. (Public Resources Code, Section 21083.2)

Historic Preservation Ordinance No. 953

Brea City Code (BCC), Chapter 20.60, Historic Preservation, establishes the Historic Resources Register and describes the procedures for the designation or removal of individual historical resources. The purpose is to promote the historical, cultural, educational, economic, and general welfare of the community by:

- Assuring that appropriate development is consistent with Land Use, Housing, and Historic Resource Elements of the Brea General Plan.
- Establishing a mechanism to identify and preserve the distinct historic and architectural characteristics of Brea which represent elements of the City's cultural, social, economic, political, and architectural history;
- Fostering civic pride in the beauty and noble accomplishments of the past as represented in Brea's historic resources;
- Encouraging preservation, restoration, and rehabilitation of structures, areas, and neighborhoods, and thereby preventing future blight.

BCC Section 20.60.030 provides criteria for the designation of individual historical resources. It stipulates that any object or improvement may be identified as a historical resource upon approval by the Planning Commission, if it meets any of the following criteria:

A. It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
B. It is identified with persons or events significant in local, state, or national history;
C. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
D. It is representative of the work of a notable builder, designer, or architect;
E. It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;
F. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;
G. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;
H. It is one of the few remaining examples in the city, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

BCC Section 20.60.060 provides plan review process for exterior alterations, including but not limited to restoration, rehabilitation, remodeling, additions, demolition, relocation, or subdivision of a designated historic resource, as stated below:

A. Exterior alterations, including but not limited to restoration, rehabilitation, remodeling, additions, demolition, relocation, or subdivision of a designated historic resource shall require a plan review in accordance with § 20.408.040 of this title.
B. In evaluating a project involving alteration to an identified historic resource, the plan review shall consider the existing and proposed architectural style, design, arrangement, texture, materials, and any other factors with regard to the original distinguishing architectural characteristics of the historic resource. The "Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" shall be used as a guide. In addition to these guidelines, the plan review shall comment on project consistency with the following performance guidelines.

    1. With regard to an identified historic structure, the proposed work should neither adversely affect the significant architectural features of the resource no adversely affect the character of the historical, architectural, or aesthetic interest or value of the resource.
    2. With regard to construction of a new improvement, addition, building, or structure upon the site of an identified historic structure, the use and exterior of such improvements would not adversely affect and would be compatible with the use and exterior of existing historic resource.

C. The Planning Commission shall review any major alteration to a historic resource in a public hearing in accordance with the procedures established in § 20.60.050.C.

Identifying sites and structures with historical significance protects these resources from potential destruction and creates added awareness of historical resources that residents may not know exist. The Planning Commission is responsible for establishing and maintaining the Register, with input from the Historical Society. Structures or sites listed in the Register are eligible for a variety of preservation incentives provided by the City and various other State and local agencies. This process is also outlined in the City of Brea Historic Preservation Guidelines.

Brea Historical Society

The Brea Historical Society, founded in 1971, collects, preserves, and displays the heritage and history of the City of Brea. Through educational programs, research studies, exhibitions, and workshops, the Brea Historical Society continues to document and promote Brea's unique contribution to an ever-changing world. Located in the former American Legion Building at City Hall Park, the Society maintains permanent and traveling exhibits and a collection of over 45,000 artifacts including rare photographs, City documents, newspapers, and various ephemera. Although the Brea Historical Society is not a government agency, the City works in partnership with them when working on matters of historical relevance including new development, restoration/maintenance of historic sites, Mills Act and Historic Preservation applications and more.

4.4.1.2 Existing Conditions

The existing conditions of both the City of Brea and the BCSP area are described together below.

City of Brea History

The City of Brea has historically been associated with natural tar seeps in the surrounding hills; the name "Brea" is derived from the Spanish word for tar. In early periods, Indigenous peoples and early settlers used oil-saturated soil for fuel and other domestic purposes, including heating and waterproofing. Following the establishment of the Santa Fe Railroad into Orange County along the Santa Ana Canyon in 1887, land companies formed to solicit buyers with aggressive land advertising campaigns. The area was originally subdivided and advertised to farmers and ranchers in the 1880s (Cogstone 2019). The agricultural industry was abandoned just before the emerging oil industry took off. In 1882, the Chandler Oil and Mining Company was the first to extract oil, drilling to depths of 100 to 300 feet in the Olinda area in Tonner Canyon. The members of the Chandler Oil and Mining Company formed the Union Oil Company of California in 1890, and the Union Oil Company expanded its holding, referred to as the Upper and Lower Stearns Lease. In 1894, Union Oil Company acquired approximately 1,200 acres for oil development. The first producing oil well, Olinda Oil Well No. 1, commenced operations in 1898, initiating an oil boom in the Brea–Olinda area and establishing the basis for subsequent urban development. By 1913, the Union Oil Company was the principal producer of oil in Southern California.

Urban development in Brea began in 1911, when commercial uses and small industries were established to support oil field workers and their families. The community was officially founded on January 19, 1911, when the town map of Randolph was refiled under the name Brea. The City of Brea was incorporated on February 23, 1917, at which time the population was approximately 752 (City of Brea 2025). In 1918, the Pacific Electric Railway connected Brea to La Habra, Whittier, and other Los Angeles communities.

Oil production in Brea decreased as the oil boom faded by the 1940s, due to natural depletion in oil reserves and the reduced economic viability of deeper, more technically challenging extraction methods. The land became more valuable for lucrative housing and commercial development, driven by post-war suburban growth, new freeways (including State Route 57), and shifting economics that favored real estate over oil extraction. As production declined, the City transitioned to a more diversified economic base and experienced steady population growth, shaping the current-day Brea. From the 1950s through the 1980s, residential, commercial, and industrial development expanded, supported by regional infrastructure improvements, including the opening of State Route 57 and the construction of the Brea Mall. Brea Mall is within the boundaries of the BCSP. During this period, industrial parks and retail centers were developed, reflecting Brea's location within northern Orange County and its proximity to major regional transportation corridors.

Previous Investigations and Records Search Results

A records search was conducted at the South Central Coast Information Center (SCCIC) using the California Historical Resources Information System (CHRIS) to determine whether previously recorded historic architectural resources exist within the Proposed Project area. The records search identified a total of 102 previously conducted cultural studies within the Proposed Project area, which documented 69 resources consisting of eight prehistoric sites, 57 historical sites, three combined prehistoric and historical sites, and one combined prehistoric and unknown resource site. Prehistoric resources include lithic scatters, hearths, and isolated artifacts (bowl fragments, metate fragments, and lithics). Historical resources include refuse/trash scatters, retaining walls, wood stove pieces, brick floor, concrete box, oil well remains, roads, and isolates (ironstone sherd, jar, electrical insulator fragment, faunal fragments, bottle, glass fragments, ceramic fragment, match box, and a can). Additionally, the following resources are identified as listed or eligible for listing on the National Register of Historic Places, or the California Register of Historical Resources: P-30-162260 (Olinda Oil Fields – also Historic Landmark 918), P-30-177676 (Brea Canyon Portola Monument), P-30-177677 (Sunburst), P-30-177678 (Brea Dam), P-30-177679 (Fullerton Dam), P-30-177680 (Carbon Canyon Dam), and P-30-177724 (Southern Sierras Powerline). The documented resources list is included in Appendix F1, Cultural Resources Data, and additional information, such as resource numbers, locations, and other identifying details, is provided in Confidential Appendix F2, Confidential Cultural Resources Data, to this PEIR.

Historic Resource Register

The following properties in Table 4.4-1, Brea Historic Resource Register, are listed on the City's Historic Resource Register as of February 9, 2022, and remain current as of January 2026. As shown on Figure 4.4-1, Historic Properties, most registered historic properties are located in the southwest portion of the City, with several located within the BCSP area.

Table 4.4-1. Brea Historic Resource Register

No.	Address	Historic Name	Year
1	401 South Brea Boulevard	Old City Hall and Park	1928
2	404 South Walnut Avenue	Brea Plunge	1929
3	495 South Brea Boulevard	Old American Legion Hall	1930
4	255/279 South Laurel (BCSP)	Practice House	1926
5	400 North Brea Boulevard	Brea Junior High School	1916
6	200 South Flower Avenue (BCSP)	Laurel Elementary School	1922
7	330 West Elm Street	Pioneer Hall	1923
8	Soon to be at Fire Station 2	Seagraves Fire Truck	1923
9	101 South Redwood Avenue (BCSP)	Dr. Walter W. Davis House	1920
10	121 South Redwood Avenue (BCSP)	William Casner House	1915
11	107 South Redwood Avenue (BCSP)	Edger Jamison House (Box House)	1911

Table 4.4-1. Brea Historic Resource Register

No.	Address	Historic Name	Year
12	114 South Redwood Avenue (BCSP)	Roy Mitchell House	1914
13	258 South Redwood Avenue (BCSP)	Charles C. Kinsler House (319-301-30)	1912
14	126 South Redwood Avenue (BCSP)	Howard Waggener House	1929
15	401 South Walnut Avenue	Frank Woodard House Circa	1920
16	101/210 West Birch Street (BCSP)	Brea Welcomes You Sign	1935
17	NWC Madrona Avenue & Birch Street	Good Old Brea Clock	1920
18	416 South Madrona Avenue	Luther Cox House	1922
19	Santa Fe Road	Olinda Museum & Historic Park	Unknown
20	335 South Flower Avenue	Rollo Fleisher House	1929
21	220 West Elm Street	Hilda Wicks House	1922
22	321 South Madrona Avenue	Fred Gale House	1924
23	323 South Madrona Avenue	Bill and Maud Anderson House	1923
24	328 South Madrona Avenue	Hodkins House	1913
25	329 South Madrona Avenue	Tom and Verna Slaton House	1935
26	335 South Madrona Avenue	Dr. David and Gladys Goodwill House	1938
27	400 South Madrona Avenue	Van Denburgh House	1922
28	405 South Madrona Avenue	James and Olive Heagerty	1921
29	406 Madrona Avenue	John Pfeiffer House	1921
30	408 South Madrona Avenue	Howard & Frances Smithie House	1922
31	409 Madrona Avenue	Martha Remp House	1922
32	412 South Madrona Avenue	Willy Lance House	1922
33	401 South Madrona Avenue	Harry and Elizabeth Becker House	1921
34	420 South Madrona Avenue	Charles and Ella Miller House	1922
35	424 Madrona Avenue	Robert Mildred Phelps House	1922
36	428 South Madrona Avenue	Alex and Rose Cordiner House	1922
37	432 South Madrona Avenue	Walter Hyde House	1921
38	435 South Madrona Avenue	Lester and Marguerite Lemmon House	1922
39	436 South Madrona Avenue	Howard and Jennie Jenness House	1921
40	444 South Madrona Avenue	George and Clara Carman House,	1922
41	448 South Madrona Avenue	Robert and Edna Critchlow House	1922
42	546 South Madrona Avenue	Florence and Henry Smith House,	1928
43	418 Sievers Avenue	Lewis Wilson HoShause	1923
44	420 Sievers Avenue	Fred and Ora Hunter House	1923
45	321 South Walnut Avenue	John and Goldie Isbell House	1922
46	331 South Walnut Avenue	John Wicks House	1921
47	333 South Walnut Avenue	Frank and Cora Stewart House	1921
48	447 South Walnut Avenue	Dr. Charles Westerhoot House	1931
49	449 South Walnut Avenue	Edward and Lillian Peterkin	1938

Table 4.4-1. Brea Historic Resource Register

No.	Address	Historic Name	Year
50	523 South Walnut Avenue	Royal Court Apartments	1924
51	553 South Walnut Avenue	Charles and Dora Smith	1920
52	120 South Redwood Avenue (BCSP)	Jay and Grace Van Ness	1923
53	210 West Elm Street	Ralph & Edytha Barnes House	1927
54	127 South Redwood Avenue (BCSP)	Glen & Dessie Dunkle House	1923
55	533 South Walnut Avenue	Ida Henry House	1925
56	440 South Madrona Avenue	Paul & Ruth McGurn	1922
57	548 South Walnut Avenue	Carl & Beatric Helmick Home	1929
58	909 East Elm Street	Carl Harvey Home	1930
59	315 South Flower Avenue	Shaffer-Wilson-Shoepe Home	1938

Archaeological Resources

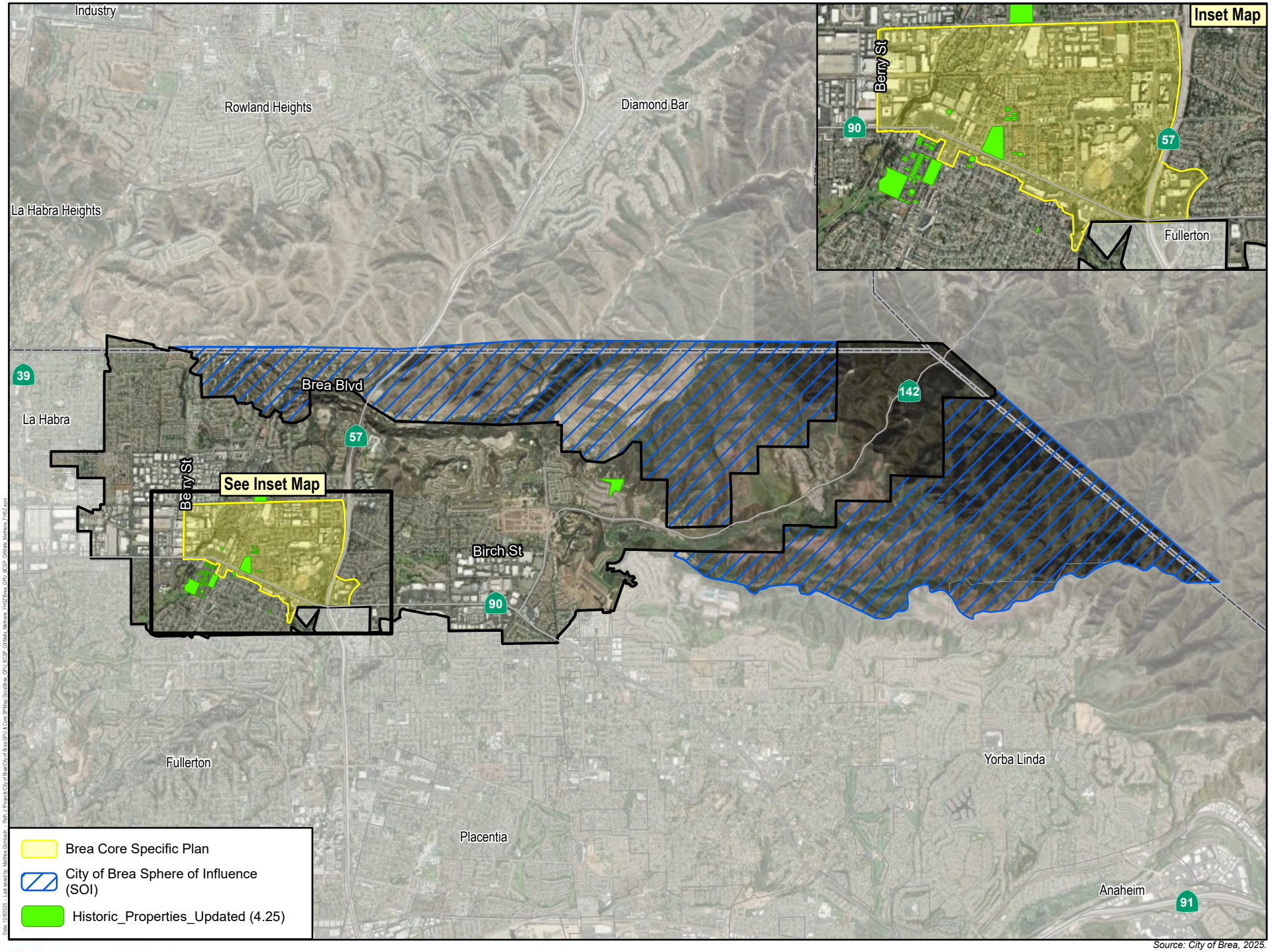
The Proposed Project area lies within an area considered by archaeologists and ethnologists to have been inhabited prehistorically by the Gabrieleno (Tongva) people (City of Brea 2003; Cogstone 2019). Their territory encompassed area stretching from Topanga Canyon in the northwest, to the base of Mount Wilson in the north, to San Bernardino in the east, Aliso Creek in the southeast and the four southern Channel Islands, in all an area of more than 2,500 square miles. Gabrielenos were hunter-gatherers whose settlement pattern and mode of habitation consisted of occupying villages and seasonally dispersing to use local resources. The Proposed Project area was used in prehistory for its abundant deposits of asphaltum, or tar. Local Native American Tribes used the naturally occurring oil and tar seeps for its adhesive, waterproofing, and medicinal purposes. Early Spanish explorers referred to the local substance as brea, Spanish for “tar” or “pitch,” from which the City of Brea gets its name from. Only a small portion of Brea has been surveyed for archaeological resources, so the full extent of archaeological resources occurring in Brea is not known.

4.4.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact on cultural resources if it would:

- **Threshold CUL-a:** Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
- **Threshold CUL-b:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- **Threshold CUL-c:** Disturb any human remains, including those interred outside of dedicated cemeteries.

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Source: City of Brea, 2025.

Harris & Associates

Figure 4.4-1
Historic Properties

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4.4.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Proposed Project and help reduce or avoid potential impacts related to cultural resources:

PPP CUL-1 **California Environmental Quality Act (CEQA) & Historical Resources:** Pursuant to the CEQA Public Resources Code (PRC), Section 21084.1, any project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. PRC, Section 5020.1(q) defines a "substantial adverse change" as demolition, destruction, relocation, or alteration such that the significance of the historical resource would be materially impaired. Historical resources are defined as "a resource listed or eligible for listing on the California Register of Historical Resources" (CRHR) (Public Resources Code, Section 5024.1; 14 California Code of Regulations, Section 15064.5). Under CEQA Guidelines, Section 15064.5(a), the term "historical resources" includes the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC, Section 5024.1). This is regarded as a "Mandatory Resource".
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant. This is regarded as a "Presumptive Resource."
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. This is regarded as a "Discretionary Resource."

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1) including the following:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in California's past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k), or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1(g) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

PPP CUL-2 Brea City Code Chapter 20.60 Historic Preservation, as it applies to all objects and/or improvements listed in the Brea Historic Resources Register, will comply with all provisions contained therein as appropriate.

PPP CUL-3 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County Coroner has been contacted. If applicable, the Native American Heritage Commission will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code, Section 5097.98.

The new or updated General Plan goals and policies related to cultural resources are included as Appendix C, Brea 2050 General Plan: Update Goals, Policies, and Actions, of this Program Environmental Impact Report (PEIR).

4.4.4 Environmental Impacts

The following sections address various potential impacts relating to cultural resources that could result from implementation of the Proposed Project.

4.4.4.1 Threshold CUL-a: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Impact Analysis

Focused General Plan Update

The Focused GPU is a policy-level planning document and does not itself propose or authorize any specific physical development. As such, its adoption would not directly result in the demolition, destruction, relocation, or alteration of a historical resource. However, future development projects that may be enabled by the Focused GPU could involve physical environmental changes that have the potential to affect historical resources. As shown in Table 4.4-1, the City currently has 59 registered historical resources. The listed registered historical resources are based on the 2022 data, which is current as of January 2026. Additional historical resources may exist that have not yet been recorded, evaluated, or formally identified. Accordingly, impacts to historical resources cannot be evaluated at a project-specific level at this time.

Future development projects would be required to undergo individual lead agency review at the time of project-level application submittal to determine if historical resources are present and if proposed activities would result in a substantial adverse change in the significance of such resources.

CEQA Guidelines, Section 15064.5, defines a historical resource as a resource listed in, or determined eligible for listing in, the California Register of Historical Resources; included in a local register of historical resources; or determined by the lead agency, in its discretion and supported by substantial evidence, to be historically significant. Although the Project area contains structures that are over 50 years of age, age alone does not determine historical significance under CEQA. CEQA Guidelines, Section 15064.5(a)(4), gives lead agencies discretion to determine that a resource is historically significant even if it is not listed or eligible for listing in a local or State register.

The City, as the lead agency, is required to evaluate whether a resource meets the criteria for listing in the California Register of historical Resources, as outlined in PPP CUL-1. Additionally, BCC Chapter 20.60, Historic Preservation, establishes procedures for identifying, evaluating, and protecting historical resources and provides a regulatory framework to avoid or minimize substantial adverse changes to such resources. This BCC chapter includes criteria for the designation of individual historical resources, and the plan review process for exterior alterations—including but not limited to restoration, rehabilitation, remodeling, additions, demolition, relocation, or subdivision of a designated historic resource—and provides performance guidelines (PPP CUL-2).

The City's updated General Plan policies also includes the following goals, policies, and actions related to historical preservation in the Community Resources Element and Community Development Element:

- **Goal CR-6: Artistic, Cultural, and Historic Resources.** A community that preserves, protects, and celebrates resources that define Brea's identity.
  - **Policy CR-6.4.** Historic Resources: Evaluate conditions and rehabilitation, costs before considering demolition.
  - **Action CR-6b.** Research funding (tax incentives, grants) for historical resources restoration.
  - **Action CR-6c.** Add resources that meet the Historic Preservation Ordinance to registers.
  - **Action CR-6e.** Work with the Historical Society to increase awareness of preservation.
  - **Policy CD-2.12: Historic Preservation.** Respect historic heritage and architectural local context.

Therefore, although future development facilitated by the Focused GPU could involve physical changes to sites that contain historically significant resources as defined under CEQA, compliance with the existing regulatory requirements would reduce potential impacts to historical resources to a less than significant level at the program level. Project-specific impacts would be evaluated during future discretionary review, at which time compliance with applicable regulations would be assessed.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measure: No mitigation measures are required.

Brea Core Specific Plan

The BCSP itself does not propose any specific development projects, but approval of this planning document would permit future development projects consistent with the BCSP. As shown in Table 4.4-1, 11 of the City's 59 registered historical resources are within the BCSP area. These registered resources are not an exhaustive list, as other historical resources may exist that have not yet been recorded, evaluated, or formally identified. Accordingly, impacts to historical resources cannot be evaluated at a project-specific level at this time.

Consistent with the analysis presented under the Focused GPU, future individual development projects within the BCSP area would be required to undergo individual lead agency review at the time of project-level application submittal to determine if historically significant resources are present and if proposed activities would result in a substantial adverse change in the significance of such resources. CEQA Guidelines, Section 15064.5(a)(4), provides lead agencies with

discretion to determine whether a resource is historically significant, even if it is not listed in, or eligible for listing in, a local or State register.

As discussed under the above Focused GPU, compliance with existing regulatory requirements as outlined in PPP CUL-1 and PPP CUL-2 would avoid or minimize substantial adverse changes to historical resources. Therefore, potential impacts to historical resources associated with implementation of the BCSP would be less than significant at the program level, with project-specific impacts evaluated during future discretionary review.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measure: No mitigation measures are required.

4.4.4.2 Threshold CUL-b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact Analysis

Focused General Plan Update

The Focused GPU is a policy-level planning document and does not propose, approve, or authorize any specific physical development or ground-disturbing activities. Therefore, adoption of the Focused GPU would not directly result in the disturbance, damage, or destruction of any known or unknown archaeological resources. However, implementation of the Focused GPU would facilitate future project-level development within the Proposed Project area. Such projects could involve grading, excavation, and other ground-disturbing activities that have the potential to adversely affect known or unknown archaeological resources. Archaeological resources may occur both at the surface and belowground, and construction activities associated with future development—particularly in areas that are undeveloped, have not been previously subject to cultural resource investigations, or where excavation would extend beyond the depth of prior disturbance—could result in impacts to these resources. In addition, buried archaeological deposits may remain in previously developed areas where past construction involved shallow foundations or limited ground disturbance.

Potential impacts to archaeological resources are inherently site-specific and cannot be fully evaluated at the program level because they depend on the location, depth, and extent of future ground-disturbing activities, as well as the presence, integrity, and significance of archaeological resources at individual sites. According to the SCCIC records search, the Project area includes eight prehistoric sites, three combined prehistoric and historical sites, and one combined prehistoric and unknown resource site.

Therefore, development facilitated by the Focused GPU could result in the inadvertent discovery and disturbance of previously unknown archaeological resources, and impacts would be

considered potentially significant unless demonstrated by a project-level cultural resources studies (e.g., Phase I archaeological surveys) that impacts would be less than significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measure: Implementation of Mitigation Measures MM CUL-1 through CUL-5 is required.

Level of Significance Before Mitigation: Less than significant.

Brea Core Specific Plan

The analysis above for the Focused GPU applies to the BCSP. The BCSP itself does not propose any specific development projects; however, approval of this planning document would allow future development projects consistent with the BCSP that may require ground-disturbing activities in areas previously undeveloped and developed and could adversely affect known or unknown archaeological resources, and impacts would be considered potentially significant unless demonstrated by a project-level cultural resources studies (e.g., Archaeological Resources Assessment) that impacts would be less than significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measure: Implementation of Mitigation Measures MM CUL-1 through MM CUL-5 is required.

Level of Significance Before Mitigation: Less than significant.

4.4.4.3 Threshold CUL-c: Disturb any human remains, including those interred outside of dedicated cemeteries.

Impact Analysis

Focused General Plan Update

Implementation of the Proposed Project would facilitate future site plan-level development projects within the Project area. Such projects could involve grading, excavation, and other ground-disturbing activities that have the potential to disturb previously unidentified human remains. CEQA assigns special importance to human remains and establishes procedures to be used when Native American remains are discovered. CEQA Guidelines, Section 15064.5(e), lists steps to be followed in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery. These steps include the following:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
  - The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and

- If the coroner determines the remains to be Native American:
  - The coroner shall contact the Native American Heritage Commission within 24 hours.
  - The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
  - The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code, Section 5097.98.

These requirements are part of existing regulatory requirements and outlined in California Health and Safety Code, Section 7050.5; Public Resources Code, Section 5097.98; and CEQA Guidelines, Section 15064.5. Although soil-disturbing activities associated with development in accordance with the Proposed Project could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The analysis above for the Focused GPU applies to the BCSP. Although soil-disturbing activities associated with development in accordance with the Proposed Project could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.4.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to cultural resources that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.4.5.1 Cumulative Threshold CUL-a: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Focused General Plan Update and Brea Core Specific Plan

Historical resources are generally site-specific; however, cumulative impacts may occur when a project, in combination with other past, present, and reasonably foreseeable future projects, results in the incremental loss of historical resources or substantially diminishes the integrity of historical settings or property types within a shared geographic or cultural context. Cumulative impacts could also occur if development alters the physical or visual setting of historical resources in a manner that materially impairs their significance.

As discussed under Sections 4.4.1.2 and 4.4.4.1, known historical resources exist within the City, and additional properties may be identified in the future that are eligible for listing in the NRHP, CRHR, or local historic registers. The City's Historic Preservation Ordinance (BCC Chapter 20.60, Historic Preservation) establishes procedures for identifying, evaluating, and protecting historical resources and provides a regulatory framework to avoid or minimize substantial adverse changes to such resources. Where impacts cannot be avoided, treatment measures consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties are required to minimize impacts to the extent feasible.

The Proposed Project is a policy-level planning action and does not directly authorize site-specific development or physical ground disturbance. While future development facilitated by the Proposed Project, when considered together with other foreseeable development, could affect historical resources if such development were located on or near eligible or listed historical resources, all future projects would remain subject to the State and local existing regulatory requirements.

Because future development would be reviewed on a project-by-project basis and would be required to avoid or minimize impacts to historical resources through compliance with existing regulations (PPP CUL-1 and PPP CUL-2), the incremental contribution of development facilitated by the Proposed Project would not be cumulatively considerable. Accordingly, cumulative impacts to historical resources would be less than significant with implementation of mitigation.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measure: No mitigation measures are required.

4.4.5.2 Cumulative Threshold CUL-b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Focused General Plan Update and Brea Core Specific Plan

Archaeological resources are generally site-specific; however, cumulative impacts may occur when a project, in combination with other past, present, and reasonably foreseeable future development, results in the incremental loss or disturbance of archaeological resources within a broader geographic area. Cumulative impacts could occur where multiple ground-disturbing activities affect archaeological deposits that share a common cultural, temporal, or regional context, or where repeated disturbances reduce the overall integrity or information potential of archaeological resources within the cumulative setting.

As discussed under Section 4.4.4.2, the Proposed Project does not directly approve or authorize site-specific development or ground-disturbing activities. Known archaeological resources exist within the Project area and additional archaeological resources may be present at or below the surface in areas that have not been previously surveyed or where prior development involved limited or shallow ground disturbance. Implementation of the Proposed Project, in combination with other foreseeable development in the region, could result in ground-disturbing activities that have the potential to affect known or unknown archaeological resources.

However, future discretionary development facilitated by the Proposed Project would be subject to site-specific lead agency review and compliance with applicable State regulations, including Public Resources Code, Sections 21083.2 and 21084.1, and CEQA Guidelines, Section 15064.5. As part of this review, future development projects would be required to conduct appropriate cultural resources studies, such as Phase I archaeological surveys, to identify archaeological resources and evaluate their significance prior to approval of ground-disturbing activities. Where archaeological resources are identified, avoidance and minimization measures would be required, and mitigation would be implemented, as appropriate, to reduce impacts to the extent feasible.

Because potential impacts to archaeological resources would be evaluated and addressed on a project-by-project basis, and because future development would be required to implement Mitigation Measures MM CUL-1 through MM CUL-5, the incremental contribution of development facilitated by the Proposed Project would not be cumulatively considerable. Accordingly, cumulative impacts to archaeological resources would be less than significant with mitigation implementation.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measure: Implementation of Mitigation Measures MM CUL-1 through MM CUL-5 is required.

Level of Significance Before Mitigation: Less than significant.

4.4.5.3 Cumulative Threshold CUL-c: Disturb any human remains, including those interred outside of dedicated cemeteries.

Focused General Plan Update and Brea Core Specific Plan

Impacts related to the disturbance of human remains are inherently site-specific and do not combine across sites to create a cumulative effect. Although cumulative development could increase the likelihood of inadvertently encountering previously unidentified human remains due to additional ground-disturbing activities, the treatment of such discoveries is governed by mandatory procedures under California Health and Safety Code, Section 7050.5; Public Resources Code, Section 5097.98; and CEQA Guidelines, Section 15064.5(e).

As discussed under Threshold CUL-c, implementation of the Proposed Project would facilitate future site-specific development that could involve ground disturbance. However, all development facilitated by the Proposed Project and other cumulative development projects in the region would be subject to the same uniformly applied statutory requirements, including immediate cessation of work, notification of the county coroner, and consultation with the NAHC and the most likely descendant, as applicable.

Because these requirements ensure that any discovery of human remains is appropriately handled and because such impacts do not accumulate across sites, the incremental contribution of development facilitated by the Proposed Project would not be cumulatively considerable. Accordingly, cumulative impacts related to the disturbance of human remains would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measure: No mitigation measures are required.

4.4.6 Level of Significance Before Mitigation

Without mitigation, environmental impacts related to Thresholds CUL-a and CUL-c would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP CUL-1 through PPP CUL-3.

Environmental impacts related to Threshold CUL-b are potentially significant without mitigation.

4.4.7 Mitigation Measures

Archaeological Resources

MM CUL-1 **Archaeological Resources Assessment.** Prior to the commencement of projects not exempt under California Environmental Quality Act (CEQA) involving ground-disturbing activities (including grading, excavation, trenching, boring, or demolition extending below existing grade) in areas that have not been previously developed or includes unpaved areas, the project proponent shall provide an Archaeological Resources Assessment as part of project-level CEQA review prepared by a qualified archaeologist. The assessment shall be prepared under the supervision of an archaeologist meeting the Secretary of the Interior's professional qualifications standards in prehistoric and/or archaeology.

The assessment shall include:

- A California Historical Resources Information System records search at the South Central Coastal Information Center;
- A review of the Native American Heritage Commission Sacred Lands File; and
- Evaluation of previous cultural resources investigations and recorded resources within and adjacent to the project site.

MM CUL-2 **Inadvertent Discovery.** If archaeological resources are encountered during ground disturbing activities, work in the immediate area shall cease and an archaeologist meeting the Secretary of the Interior's professional qualifications standards in prehistoric and/or archaeology shall be contacted immediately to evaluate the find(s). If the discovery proves to be significant as determined by the qualified archeologist, procedures outlined in Mitigation Measure MM CUL-6 shall be implemented.

MM CUL-3 **Evaluation and Mitigation of Significant Archaeological Resources.** If potentially significant archaeological resources are identified under Mitigation Measure MM CUL-1 or MM CUL-2, and avoidance is not feasible, a Phase II Testing and Evaluation Program shall be conducted to determine resource significance prior to ground disturbance. Phase II investigations shall be conducted by a qualified archaeologist and in coordination with affiliated California Native American Tribes, where applicable.

If archaeological resources are determined to be significant or unique and cannot be avoided, appropriate site-specific mitigation shall be implemented, which may include a Phase III Data Recovery Program. Data recovery shall be conducted in accordance with the Office of Historic Preservation's guidelines, including

Archaeological Resource Management Reports: Recommended Contents and Format and Guidelines for Archaeological Research Designs.

MM CUL-4 **Construction Monitoring in High-Sensitivity Areas.** If the Archaeological Resources Assessment identifies the project site as highly sensitive for archaeological resources, a qualified archaeologist and a Native American monitor, approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated, shall monitor all ground-disturbing activities in sensitive areas.

Prior to construction, the archaeologist shall conduct a worker environmental awareness training addressing the identification and protection of archaeological resources. The Native American monitor shall be invited to participate.

If archaeological materials are discovered, work shall cease in the vicinity of the discovery until the resources are evaluated by the qualified archaeologist, in coordination with the Native American monitor and affiliated Tribe(s), as appropriate. The treatment and final disposition of materials shall be determined through Tribal consultation and may include curation, repatriation, or reinterment.

MM CUL-5 **On-Call Archaeological Monitoring in Moderate-Sensitivity Areas.** If the Archaeological Resources Assessment identifies the project site as having moderate sensitivity, a qualified archaeologist shall be retained on an on-call basis. Pre-construction training shall be provided to construction personnel regarding procedures for unanticipated discoveries.

If archaeological resources are encountered, construction shall halt in the immediate area, and the on-call archaeologist shall evaluate the discovery and initiate Tribal consultation, where applicable. Appropriate treatment and disposition of materials shall be determined in consultation with affiliated Tribe(s).

4.4.8 Level of Significance After Mitigation

Threshold CUL-b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Implementation of Mitigation Measures MM CUL-1 through MM CUL-5 would reduce potential adverse impacts to archaeological resources to a less than significant level by requiring site-specific evaluation and being required to avoid or minimize impacts to archaeological resources through compliance with existing regulations and mitigation measures. No significant and unavoidable impacts would remain.

4.5 Energy

This section evaluates the potential for impacts on energy resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.5.1 Environmental Setting

4.5.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address energy.

Federal

Federal Clean Air Act (U.S. Code, Title 42, Section 7401 et seq.)

The Clean Air Act (CAA) of 1970 is the comprehensive Federal law that regulates air emissions from stationary and mobile sources. The CAA authorizes the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants. The USEPA has classified air basins (or portions thereof) as being in "attainment," "non-attainment," or "unclassified" for each criteria air pollutant based on whether the NAAQS have been achieved. Non-attainment areas are air basins that do not meet one or more of the California Ambient Air Quality Standards (CAAQS) and are subject to additional restrictions as required by the USEPA. If an area is designated unclassified, it is because inadequate air quality data was available as a basis for a non-attainment or attainment designation. The USEPA classifies the South Coast Air Basin as in attainment for the Federal carbon monoxide (CO), nitrogen dioxide (NO_2), lead, respirable particulate matter (PM_{10}), and sulfur dioxide (SO_2) standards. The South Coast Air Basin is classified as extreme non-attainment for the Federal ozone (O_3) standard and serious non-attainment for the fine particulate matter ($PM_{2.5}$) standard (SCAQMD 2016).

Energy Independence and Security Act (Public Law 110-140)

The Energy Independence and Security Act of 2007 seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels, improving vehicle fuel economy, and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the Federal government. The Energy Independence and Security Act sets increased Corporate Average Fuel Economy Standards, the Renewable Fuel Standard, appliance energy efficiency standards, building energy efficiency standards, and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2025a).

Energy Policy and Conservation Act (Public Law 94-163)

In 1975, Congress enacted the Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the Energy Policy and Conservation Act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2010, fuel economy standards were set at 27.5 miles per gallon (mpg) for new passenger cars and 23.5 mpg for new light-duty trucks. Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) were not subject to fuel economy standards in 2010. Passenger cars and light trucks used directly or indirectly associated with a project would be required to comply with the applicable fuel economy standards. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

The standards have been modified several times to cover additional model years, incorporating increasingly stringent standards over time. Standards for model years 2027–2031 were finalized in 2024. In this final rule, fuel economy is estimated to increase 2 percent per year for model years 2027–2031 for passenger cars, while light trucks will increase 2 percent per year for model years 2029–2031. These increases will bring the average light-duty vehicle fuel economy up to approximately 50.4 mpg by model year 2031 (NHTSA 2025a). Most recently, in 2025, the NHTSA issued a Notice of Proposed Rulemaking that includes eliminating the inter-manufacturer credit trading system and amending standards to an industry fleetwide average for all light-duty vehicles of roughly 34.5 mpg in model year 2031 (NHTSA 2025b).

State

Assembly Bill 1007: State Alternative Fuels Plan

Assembly Bill (AB) 1007 requires the California Energy Commission to prepare a plan to increase the use of alternative fuels in California. The State Alternative Fuels Plan was prepared by the California Energy Commission with the California Air Resources Board (CARB) and in consultation with other Federal, State, and local agencies to reduce petroleum consumption, increase use of alternative fuels (e.g., ethanol, natural gas, liquefied petroleum gas, electricity, and hydrogen), reduce greenhouse gas (GHG) emissions, and increase in-State production of biofuels. The State Alternative Fuels Plan recommends a strategy that combines private capital investment, financial incentives, and advanced technology that will increase the use of alternative fuels, result in significant improvements in the energy efficiency of vehicles, and reduce trips and vehicle miles traveled (VMT) through changes in travel habits and land management policies. The Alternative Fuels and Vehicle Technologies Funding Program legislation (AB 118, Statutes of 2007) proactively implements the State Alternative Fuels Plan.

State of California Energy Plan

The California Energy Commission is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan calls for California 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 State Energy Plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

Tractor-Trailer Greenhouse Gas Regulation and Greenhouse Gas Standards for Medium- and Heavy-Duty Engines and Vehicles

CARB approved the Tractor-Trailer Greenhouse Gas (TTGHG) regulation in December 2008 for the purpose of reducing GHG emissions from long-haul tractors and trailers. GHG emissions would be reduced by improving the aerodynamic performance and reducing the rolling resistance of tractor-trailers. The requirements specified in the regulation are based on elements of the U.S. Environmental Protection Agency's SmartWay program, which supports the availability of more efficient equipment. The TTGHG has been updated over time, and California also implemented GHG-reducing standards for medium- and heavy-duty engines. In 2014, concurrent with the adoption of California Phase 1 GHG regulations, CARB modified the TTGHG regulation by sunsetting the requirements for model year 2014 and later tractors. Affected tractors under this regulation were no longer required to be SmartWay-verified models or use SmartWay-verified low rolling resistance (LRR) tires because such requirements were duplicative of the then newly adopted Phase 1 certification requirements for tractors. Most recently, in 2018, concurrent with the adoption of California Phase 2 GHG regulations that introduced trailer standards, CARB modified the TTGHG regulation by providing trailer fleet owners the option of complying with the TTGHG regulation by using a California Phase 2-certified trailer or by using a trailer retrofitted with Phase 2-compliant aerodynamic technologies and LRR tires. The modification also includes the term "long box-type trailer," defined as a trailer that is greater than 50 feet in length (CARB 2025).

Renewables Portfolio Standard

Senate Bill 100

On September 10, 2018, Governor Jerry Brown signed Senate Bill (SB) 100, which replaces the SB 350 requirement of 45 percent renewable energy by 2027 with the requirement of 50 percent by 2026 and raises California's Renewables Portfolio Standard (RPS) requirements for 2050 from 50 to 60 percent. SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Furthermore, the bill also establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end users and 100

percent of electricity procured to serve State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 350

SB 350 was signed into law in September 2015. SB 350 establishes tiered increases to the RPS of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal of doubling energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08

The California RPS program was established in 2002 under SB 1078 (Sher) and SB 107 (Simitian). The California RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the California RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expanded the State's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). The California Public Utilities Commission is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the State. All electricity retail sellers had an interim target between compliance periods to serve at least 38.5 percent of their load with RPS-eligible resources by December 31, 2022. In general, retail sellers either met or exceeded the interim 38.5 percent target and are on track to achieve their compliance requirements (CPUC 2025).

Appliance Efficiency Regulations

California's Appliance Efficiency Regulations contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods (CEC 2025a).

California Building Standards Code (Title 24, Part 6 and Part 11)

California Code Title 24, Part 6 (also referred to as the California Energy Code), was promulgated by the California Energy Commission in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. The California Energy Code provides energy efficiency standards for residential and non-residential buildings. California's

building efficiency standards are updated on an approximately three-year cycle. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods.

The latest update to the California Code of Regulations, Title 24, Part 6, was approved in 2021 and took effect on January 1, 2023 (the 2022 Standards). The 2022 Standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards. The 2025 Standards will go into effect on January 1, 2026. The 2025 Standards emphasize the use of heat pumps for space heating and water heating, as well as photovoltaic and battery storage systems. The standards also strengthen ventilation standards to improve indoor air quality.

California Code of Regulations, Title 24, Part 11, California Green Building Standards Code (CALGreen), is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on August 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated regularly, with the most recent approved update incorporating the 2025 California Green Building Code Standards, which became effective on January 1, 2026**.**

Executive Order N-79-20

Executive Order N-79-20 requires that by 2035, all new cars and passenger trucks sold in California will be zero-emission vehicles (ZEV). Under the order, CARB is mandated to develop and propose strategies to achieve 100 percent zero emissions from medium- and heavy-duty on-road vehicles in California by 2045, where feasible, and by 2035 from drayage trucks. Final details for achieving the goal are not available, but CARB has several existing programs to encourage ZEV adoption. These include the Carl Moyer Program, which provides incentives to replace existing vehicles and equipment with the cleanest available technology, and the Low Carbon Transportation Program, which focuses on advancing technologies through zero-emissions demonstration projects and supports the deployment of on-road zero-emissions technologies. The Advanced Clean Cars II (ACC II) Program, discussed below, provides the regulatory framework for meeting the sales requirement set forth in EO N-79-20. The USEPA granted CARB its California CAA waiver request on December 18, 2024; however, as noted below, Public Law 119-16 rescinded California's waiver under the CAA.

Advanced Clean Cars Program

The Advanced Clean Cars Program refers to several regulations that reduce pollutant emissions from vehicles, including the low-emissions vehicle criteria and GHG regulations, and ZEV regulation. Advanced Clean Cars I was adopted in 2012, and Advanced Clean Cars II was adopted in 2022. These regulations rapidly scale down emissions of light-duty passenger cars, pickup

trucks, and SUVs and require an increased number of ZEVs to meet air quality and climate change emissions goals. On June 12, 2025, Public Law No. 119-16 rescinded the USEPA's December 2024 CAA waiver, which allowed California to implement and enforce Advanced Clean Cars II by including EO N-79-20's ZEV mandate, targeting 100 percent new light-duty ZEV sales by 2035. As discussed above, the impacts of Public Law No. 119-16 are uncertain pending the outcome of litigation challenging the rescission.

Assembly Bill 130/Senate Bill 131

AB 130 and SB 131, signed into effect in June 2025, are intended to streamline California Environmental Quality Act (CEQA) review of new housing development. AB 130 and SB 131 expanded CEQA exemptions for qualifying housing projects, specifically new infill development. AB 130 also included limitations on local jurisdictions' ability to update building codes to apply more restrictive standards to housing development, including green building standards, effective October 1, 2025, through June 1, 2031.

Local

2003 Brea General Plan

The Community Resources Element of the currently adopted 2003 Brea General Plan includes the following goals and policies related to air quality that would also support energy conservation:

- **Goal CR-13:** Improve Air Quality
  - **Policy CR-13.2:** Promote energy conservation and recycling by public and private sectors.
  - **Policy CR-13.4:** Encourage the expansion and retention of local-serving retail businesses (e.g., restaurants, family medical offices, drug stores) to reduce the number and length of automobile trips to comparable services located in other jurisdictions.
  - **Policy CR-13.5:** Encourage alternative modes of transportation, such as walking, biking, and public transportation to reduce emissions associated with automobile use.

Additionally, the Public Safety Element includes the following policy related to energy service:

- **Goal PS-1:** Provide the highest quality public safety services to the Brea community.
  - **Policy PS-1.16:** Ensure the reliability of essential facilities such as hospitals, and first-response buildings in the event of an emergency through promoting grid resiliency and energy independence. Work to implement on-site generation through photovoltaic systems and battery storage.

4.5.1.2 Existing Conditions

Electricity

The Project area is in Southern California Edison's (SCE's) service area, which includes portions of multiple Southern California Counties, from Orange and Riverside Counties in the south to Santa Barbara County in the west to Mono County in the north (SCE 2025a). Total electricity consumption in Orange County was 19,225 gigawatt-hours in 2024 (CEC 2025b). Sources of electricity in the SEC's power mix in 2022 were as follows (SCE 2022):

- 33.2 percent renewable, consisting mostly of solar and wind
- 3.4 percent large hydroelectric
- 24.7 percent natural gas
- 8.3 percent nuclear
- 0.1 percent other
- 30.3 percent unspecified sources (purchased electricity not traceable to specific sources)

Natural Gas

Southern California Gas Company (SoCalGas) provides gas service in the City of Brea (City) and has facilities throughout the City. The service area of SoCalGas spans 20,000 square miles in the southern half of California, from Imperial County in the southeast to San Luis Obispo County in the north (SoCalGas 2025). Total natural gas consumption in Orange County was 561.7 million therms for 2024 (CEC 2022c).

Project Area Energy Usage

Electricity, natural gas, and fuel consumption in the Focused GPU and BCSP area are summarized below.

Focused General Plan Update Area

Existing development in the City results in energy consumption from fuel use (i.e., motor gasoline); electricity use for lighting and for heating, ventilation, and air conditioning systems in existing buildings; and natural gas use for heating. Energy use for existing development was estimated using the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.33) and the assumptions described in Section 4.2, Air Quality, of this PEIR and per-gallon conversion factors from the USEPA (2025b) for motor gasoline. Table 4.5-1, Existing Energy Use in Focused GPU Area, shows the calculated existing energy use in the City.

Table 4.5-1. Existing Energy Use in Focused GPU Area

Energy/Fuel Type	Amount
Electricity	389,361,180 kWh/yr
Natural Gas	777,144,543 KBTU/yr
Fossil Fuel	30,267,540 gallons

Source: See CalEEMod output (Appendix D1) and fuel use calculations (Appendix D2).
Notes: KBTU/yr = kilo British thermal unit per year; kWh/yr = kilowatt-hour per year
Assumes a conversion factor of 8.78 kg/CO_2 per gallon for motor gasoline. Detailed calculations are provided in Appendix D2.

Brea Core Specific Plan Area

Existing development in the BCSP area also consumes fuel, electricity, and natural gas. Consistent with the assumptions of the analysis in Section 4.2, energy use is estimated using CalEEMod and per-gallon conversion factors from the USEPA (2025b) for motor gasoline. Table 4.5-2, Existing Energy Use in BCSP Area, shows the estimated energy use in the BCSP area.

Table 4.5-2. Existing Energy Use in BCSP Area

Energy/Fuel Type	Amount
Electricity	55,419,609 kWh/yr
Natural Gas	46,354,808 KBTU/yr
Fossil Fuel	5,742,711 gallons

Source: See CalEEMod output (Appendix D1) and fuel use calculations (Appendix D2).
Notes: KBTU/yr = kilo British thermal unit per year; kWh/yr = kilowatt-hour per year

4.5.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Project would have a significant impact on energy if it would:

- **Threshold EN-a:** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.
- **Threshold EN-b:** Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

4.5.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and BCSP and help reduce or avoid potential impacts related to energy:

PPP EN-1 New buildings are required to achieve the current California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards

Code (CALGreen) (Title 24, Part 11). The 2022 Building Energy Efficiency Standards were effective on January 1, 2023, and the 2025 Building Energy Efficiency Standards will become effective on January 1, 2026.

PPP EN-2 New buildings are required to adhere to the California Green Building Standards Code (CALGreen) requirement to provide bicycle parking for new non-residential buildings, or meet local bicycle parking ordinances, whichever is stricter (CALGreen Sections 5.106.4.1, 14.106.4.1, and 5.106.4.1.2).

PPP EN-3 California's Green Building Standards Code (CALGreen) requires the recycling and/or salvaging for reuse at a minimum of 65 percent of the nonhazardous construction and demolition waste generated during most "new construction" projects (CALGreen Sections 4.408 and 5.408). Construction contractors are required to submit a Construction Waste Management Plan that identifies the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project, or salvaged for future use or sale and the amount (by weight or volume).

PPP EN-4 Construction activities are required to adhere to Title 13, Section 2499, of the California Code of Regulations, which requires that nonessential idling of construction equipment be restricted to five minutes or less.

4.5.4 Environmental Impacts

The following sections address various potential impacts relating to energy that could result from implementation of the Project.

4.5.4.1 Threshold EN-a: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Impact Analysis

The following sections address various potential impacts relating to energy that could result from implementation of the Proposed Project.

Focused General Plan Update

Construction

Construction of development under the Focused GPU would require temporary increases in energy demand. Construction energy impacts involve the one-time, non-recoverable energy costs associated with construction of structures and supporting features, such as parking lots and new infrastructure. During construction, an increase in energy consumption would occur through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment and the use of

electricity for lighting and other sources. Individual construction projects may require demolition, site preparation, grading, utility installation, building construction, paving, and architectural coatings. It is assumed that construction would be typical for the region because the Project area does not include unique features, such as remote areas identified for development, that would result in unusual energy use.

Annual construction energy consumption is estimated based on the assumptions outlined in Section 4.2 of this PEIR. It is assumed that an equal amount of construction would occur each year over the course of Focused GPU buildout. Total diesel fuel use and motor gasoline consumption from the operation of construction equipment, haul truck trips, vendor truck trips, and worker vehicle trips are summarized in Table 4.5-3, Focused GPU Annual Construction Diesel Fuel and Gasoline Use. Fuel use is estimated based on the results of CalEEMod modeling (Appendix D1) and per-gallon conversion factors from the USEPA (2025b) for motor gasoline and diesel fuel. Although alternatively fueled construction equipment may be used for future construction projects, CalEEMod default construction assumptions are assumed, including use of a diesel construction equipment fleet. Consistent with model default assumptions, electricity and natural gas use during construction was not assumed. Estimated annual construction fuel consumption is summarized in Table 4.5-3, Focused GPU Construction Diesel Fuel and Gasoline Use.

Table 4.5-3. Focused GPU Annual Construction Diesel Fuel and Gasoline Use

Fuel Type	Amount
Diesel Fuel	302,086 gallons
Motor Gasoline	59,431 gallons

Sources: See CalEEMod output (Appendix D1) and fuel use calculations (Appendix D2); 2025b 2025 (conversion factors).

Notes: Includes fuel use from construction equipment, haul truck trips, vendor truck trips, and worker vehicle trips. Assumes a conversion factor of 10.21 kg/CO_2 for diesel fuel and 8.78 kg/CO_2 for motor gasoline. Detailed calculations are provided in Appendix D2.

To limit wasteful and unnecessary energy consumption, future construction contractors would be required to minimize nonessential idling of construction equipment in accordance with California Code of Regulations, Title 13, Article 4.8, Chapter 9, Section 2449. In addition, electricity may be available on individual construction sites through existing power lines and connections, which could minimize or avoid the use of less-efficient diesel generators. Furthermore, construction-related trips would avoid unnecessary energy use because the Focused GPU area is already developed and served by an established roadway network, including several regional freeway systems, such as Imperial Highway (State Route [SR-] 90) and SR-142 and SR-57, which provide direct access throughout the region. Overall, construction activities associated with land use developments accommodated under the Focused GPU would not result in energy use that is inefficient, wasteful, or unnecessary compared to similar development projects. Therefore, construction-related energy impacts would be less than significant.

Operation

Table 4.5-4, Focused GPU Buildout (Year 2050) Energy Use, includes energy use estimates for electricity, natural gas, and vehicle fuel (fossil fuels) from implementation of development accommodated under the Focused GPU compared to baseline (year 2025) conditions. Energy use for future development was estimated using the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.33), the assumptions described in Section 4.2 of this PEIR, and per-gallon conversion factors from the USEPA (2025b) for motor gasoline.

Table 4.5-4. Focused GPU Buildout (Year 2050) Energy Use

Energy Type	Annual Usage	Existing Usage	Net Change
Electricity	538,024,283 kWh/yr	389,361,180 kWh/yr	148,663,103 kWh/yr
Natural Gas	1,032,717,532 kBTU/yr	777,144,543 KBTU/yr	255,572,989 KBTU/yr
Vehicle Fuel Use	28,279,841 gallons/yr	30,267,540 gallons/yr	(−1,987,699 gallons/yr)

Source: See CalEEMod output and fuel use calculations in Appendix D1 and D2.

Notes: kWh/yr = kilowatt-hour per year; KBTU/yr = kilo British thermal unit per year; Assumes a conversion factor of 8.78 kg/CO_2 for motor gasoline. Detailed calculations are provided in Appendix D2.

Electrical service to the Focused GPU area would continue to be provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure. Natural gas would continue to be provided through SoCalGas. As shown in Table 4.5-4, electricity and natural gas use associated development under the Focused GPU would increase compared to existing conditions. However, future development would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen. As these standards are updated triennially, it is anticipated that development to occur in later years would result in less energy consumption than similarly sized development in the near-term. Because these later year developments would be required to comply with the more efficient applicable energy efficiency regulations, development would not result in wasteful, inefficient, or unnecessary electricity and natural gas demands.

As shown in Table 4.5-4, total fuel use is anticipated to decrease under buildout conditions. This decrease is anticipated to occur even though VMT would increase compared to existing conditions (refer to Section 4.13, Transportation, of this PEIR) because fuel emissions standards are anticipated to continue to become increasingly stringent over time. Older, less fuel-efficient vehicles would be taken off the road over time. As noted in Section 4.5.1.1, Regulatory Setting, California emissions standards are currently being challenged at the Federal level. The outcome of these challenges may result in less stringent future emissions standards than currently anticipated at the California level. Additionally, as discussed under Section 4.13.4.2 (Threshold TRA-b), the Project would result in less than significant VMT impacts because it would not result in an increase in VMT per service population compared to the 2003 Brea General Plan Buildout or future conditions without the Project. Thus, it is expected that operation-related fuel usage associated with the Proposed Project would not be any more inefficient, wasteful, or unnecessary than similar

development projects. Therefore, impacts would be less than significant with respect to operation-related fuel usage.

Summary

As demonstrated above, the Focused GPU would result in an increase in electricity, natural gas, and fossil fuel use during construction and operation. However, energy use from implementation of the Focused GPU would not result in a wasteful, inefficient, or unnecessary consumption of energy. Development under the Focused GPU would comply with applicable Federal, State, and local regulations during construction and operation. The plans do not include any components that would encourage or enable wasteful, inefficient, or unnecessary resource consumption. Potential impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Construction

Construction of development under the BCSP would require temporary increases in energy demand from individual construction projects, similar to the Focused GPU. Annual construction energy consumption is estimated based on the assumptions outlined in Section 4.2 of this PEIR and per-gallon conversion factors from the USEPA (2025b). Estimated annual construction fuel consumption is summarized in Table 4.5-5, BCSP Annual Construction Diesel Fuel and Gasoline Use.

Table 4.5-5. BCSP Annual Construction Diesel Fuel and Gasoline Use

Fuel Type	Amount
Diesel Fuel	42,899 gallons
Motor Gasoline	17,847 gallons

Sources: See CalEEMod output and fuel use calculations (Appendix D1 and D2).

Notes: Includes fuel use from construction equipment, haul truck trips, vendor truck trips, and worker vehicle trips. Assumes a conversion factor of 10.21 kg/CO_2 for diesel fuel and 8.78 kg/CO_2 for motor gasoline.

As with development under the Focused GPU, development under the BCSP would be required to minimize nonessential idling of construction equipment during construction in accordance with California Code of Regulations, Title 13, Article 4.8, Chapter 9, Section 2449. Due to the developed nature of the BCSP area, future electricity may be available on individual sites for use during construction to minimize or avoid the use of generators. The BCSP area is located adjacent to SR-90 and SR-57, minimizing inefficient fuel use by providing direct routes to various areas of the region. Overall, it is expected that construction fuel associated with land use developments accommodated under the BCSP would not be any more inefficient, wasteful, or unnecessary than

similar development projects. Therefore, impacts would be less than significant during construction under the BCSP.

Operation

Table 4.5-6, BCSP Buildout (Year 2050) Energy Use, includes energy use estimates for electricity, natural gas, and vehicle fuel (fossil fuels) from implementation development accommodated under the BCSP compared to baseline (year 2025) conditions. Energy use for future development was estimated consistent with the assumption described in Section 4.2 of this PEIR. Electricity and natural gas consumptions are estimated by CalEEMod, and vehicle fuel use assumes per-gallon conversion factors from the USEPA (2025b) for motor gasoline.

Table 4.5-6. BCSP Buildout (Year 2050) Energy Use

Energy Type	Annual Usage	Existing Usage	Net Change
Electricity	80,076,315 kWh/yr	55,419,609 kWh/yr	24,656,706 kWh/yr
Natural Gas	90,973,954 kBTU/yr	46,354,808 KBTU/yr	44,619,146 KBTU/yr
Vehicle Fuel Use	7,065,376 gallons/yr	5,742,711 gallons/yr	1,322,665 gallons/yr

Source: See CalEEMod output and fuel use calculations (Appendix D1 and D2).

Notes: kWh/yr = kilowatt-hour per year; KBTU/yr = kilo British thermal unit per year; Assumes a conversion factor of 8.78 kg/CO_2 for motor gasoline. Detailed calculations are provided in Appendix D2.

As shown Table 4.5-6, electricity, natural gas, and fuel use associated development under the BCSP would increase compared to existing conditions. As with the Focused GPU, future development would be required to comply with the Building Energy Efficiency Standards and CALGreen, including updated future standards as applicable. Because development would be required to comply with the applicable energy efficiency regulations, development would not result in wasteful or inefficient electricity and natural gas demands. Therefore, the Proposed Project would not result in a significant impact related to electricity or natural gas.

As shown in Table 4.5-6, total fuel use is anticipated to increase under buildout conditions because the BCSP would increase development density in the BCSP area. However, as discussed under Impact 4.13-2, the BCSP result in less than significant VMT impacts because, similar to the Focused GPU, VMT per service population would decrease under the BCSP compared to future conditions without BCSP implementation. Thus, it is expected that operation-related fuel usage associated with the Proposed Project would not be any more inefficient, wasteful, or unnecessary than similar development projects. Therefore, impacts would be less than significant with respect to operation-related fuel usage.

Summary

As demonstrated above, the BCSP would result in an increase in electricity, natural gas, and fossil fuel use during construction and operation. However, energy use from implementation of the BCSP would not result in a wasteful, inefficient, or unnecessary consumption of energy.

Development under the BCSP would comply with applicable Federal, State, and local regulations during construction and operation. The plans do not include any components that would encourage or enable wasteful, inefficient, or unnecessary resource consumption. Potential impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.5.4.2 Threshold EN-b: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

The City has not adopted a Renewable or Energy Efficiency Plan. As such, the following evaluates consistency of the Proposed Project with California energy programs.

California has established electricity goals for transitioning to renewable energy under its RPS Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 44 percent by 2024, 50 by 2026, 52 percent by 2027, 60 percent by 2030, and 100 percent by 2045. The RPS requirements apply to the Project utility providers and do not directly apply to individual development projects. However, the development accommodated under the Proposed Project that requires service from SCE would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen, including residential requirements for solar photovoltaic systems. As described under Threshold EN-a, development accommodated by the Project would not result in wasteful, inefficient, or unnecessary electricity use. Therefore, implementation of the Project would not obstruct the ability of SCE to achieve California's RPS Program targets, and impacts related to California electricity goals would be less than significant.

Transitioning away from the use of natural gas is a California goal aimed at achieving Statewide emissions reduction targets (refer to Section 4.7, Greenhouse Gas Emissions). As discussed in Section 4.2 of this PEIR, recent California action (AB 130) has limited local jurisdiction's ability to place limits on new development's natural gas use. However, new development under the Project would be required to comply with Building Energy Efficiency Standards and CALGreen, which include increasingly stringent requirements to reduce natural gas use. For example, the 2025 Standards will increase residential requirements to be electric appliance-ready, and require the use of heat pumps in single-family homes for heating. Future development would comply with applicable building standards; therefore, impacts related to California natural gas goals would be less than significant.

Regarding fuel use, the State Energy Plan calls for California 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. Additionally, the Advanced Clean Car standards require increasingly more fuel-efficient vehicles. Individual projects do not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources. However, the vehicles associated with growth under the Proposed Project would be required to comply with Federal and State fuel efficiency standards, such as the Advanced Clean Cars Program. As described in the VMT analysis (Section 4.13, Transportation), the Proposed Project would be VMT-efficient compared to the 2003 General Plan Buildout and future conditions without project implementation. Therefore, potential impacts related to fuel use goals would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.5.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to energy that could result from implementation of the Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.5.5.1 Cumulative Threshold EN-a: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Focused General Plan Update and Brea Core Specific Plan

Construction and operation of future projects under the Proposed Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, development would be accommodated within areas currently served by SCE and SoCalGas. The Project does not include components that would encourage or enable or inefficient uses of energy. Cumulative development in the SCE and SoCalGas service areas would similarly be required to comply with applicable standards, including the Building Energy Efficiency Standards and CALGreen, which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. As such, due to existing regulatory processes, the Proposed Project and cumulative projects would not result in cumulatively considerable environmental impact due to wasteful,

inefficient, or unnecessary consumption of energy. Thus, potential impacts would be less than cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.5.5.2 Cumulative Threshold EN-b: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Focused General Plan Update and Brea Core Specific Plan

The Proposed Project would not conflict with any adopted California or local plans for renewable energy or energy efficiency. Cumulative developments would also be required to be consistent with applicable regulations adopted to support California-wide energy goals, such as Title 24 Energy Efficiency Standards. Because it can be assumed that other cumulative projects would implement features to reduce inefficient or unnecessary energy use, the Proposed Project and cumulative projects would not conflict with California's Energy Conservation Plans. As such, potential impacts due to a conflict with or obstruction of a California or local plan for renewable energy or energy efficiency would be less than cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.5.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds EN-a and EN-b would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP EN-1 through PPP EN-4, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.5.7 Mitigation Measures

No mitigation measures are required.

4.5.8 Level of Significance After Mitigation

Not applicable.

4.6 Geology and Soils

This section evaluates the potential for impacts on geology and soils—specifically, paleontological resources—resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project). Other environmental impacts related to geology and soils are addressed in Chapter 5, Effects Found Not to Be Significant, of this Program Environmental Impact Report (PEIR).

4.6.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to paleontological resources.

4.6.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address paleontological resources.

Federal

Antiquities Act (16 USC 431–433)

The Antiquities Act of 1906 states, in part, the following:

> That any person who shall appropriate, excavate, injure or destroy any historic or prehistoric ruin or monument, or any object of antiquity, situated on lands owned or controlled by the Government of the United States, without the permission of the Secretary of the Department of the Government having jurisdiction over the lands on which said antiquities are situated, shall upon conviction, be fined in a sum of not more than five hundred dollars or be imprisoned for a period of not more than ninety days, or shall suffer both fine and imprisonment, in the discretion of the court.

Although there is no specific mention of natural or paleontological resources in the act itself or in the act's uniform rules and regulations (43 CFR 3), the term "objects of antiquity" has been interpreted to include fossils by the National Park Service, Bureau of Land Management, U.S. Forest Service, and other Federal agencies. Permits to collect fossils on lands administered by Federal agencies are authorized under this act. However, because the wording is imprecise and leaves large gray areas to interpretation, agencies are hesitant to interpret this act as governing paleontological resources.

Paleontological Resources Preservation, Omnibus Public Lands Act, Public Law 111-011, Title VI, Subtitle D

This legislation directs the Secretaries of the U.S. Department of the Interior and U.S. Department of Agriculture to manage and protect paleontological resources on Federal land using "scientific principles and expertise." To formulate a consistent paleontological resources management framework, the act incorporates most of the recommendations from the Secretary of the Interior's Assessment of Fossil Management on Federal and Indian Lands (USDI 2000). In passing the act, Congress officially recognized the scientific importance of paleontological resources on some Federal lands by declaring that fossils from these lands are Federal property that must be preserved and protected. The act codifies existing policies of the Bureau of Land Management, National Park Service, U.S. Forest Service, Bureau of Reclamation, and U.S. Fish and Wildlife Service and provides the following:

- Uniform criminal and civil penalties for illegal sale and transport and theft and vandalism of fossils from Federal lands
- Uniform minimum requirements for paleontological resource-use permit issuance (terms, conditions, and qualifications of applicants)
- Uniform definitions for "paleontological resources" and "casual collecting"
- Uniform requirements for curation of Federal fossils in approved repositories

State

California Public Resources Code, Section 5097.5

Paleontological sites are protected under a variety of State policies and regulations in the California Public Resources Code. In addition, paleontological resources are recognized as nonrenewable resources and receive protection under the California Public Resources Code and the California Environmental Quality Act (CEQA). California Public Resources Code, Section 5097.5, states the following:

> A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. . . . A violation of this section is a misdemeanor.

This statute prohibits the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with California Public Resources Code, Section 5097.5, for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. California Public Resources Code, Section 5097.5, also establishes the removal of paleontological

resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, county, city, and district) lands.

Local

Brea City Code, Chapter 20.206.050.D.2, Application Filing Requirements, for HR Hillside Residential Zone requires submittal of a paleontological resources technical report that includes existing conditions and constraints composite maps, as part of the required application forms and fees. No such requirements exist for other zoning designations in the City.

4.6.1.2 Existing Conditions

According to the Paleontological Resources Preservation Act of 2009 (43 Code of Federal Regulations, Section 49), which protects paleontological resources on Federal lands, paleontological resources are the fossilized remains, traces, or imprints of prehistoric plant and animal life preserved in or on the Earth's crust, except for:

1. Those that are found in an archaeological context and are an archaeological resource as defined in section 3(1) of the Archaeological Resources Protection Act of 1979 (16 U.S. Code [USC] 470bb(1)); or
2. "Cultural items," as defined in section 2 of the Native American Graves Protection and Repatriation Act (25 USC 3001); or
3. Resources determined in writing by the federal land manager to lack paleontological interest or not provide information about the history of life on earth, based on scientific and other management considerations.

Fossil remains, such as bones, teeth, shells, and wood, are found in the geologic deposits (rock formations) in which they were originally buried. Paleontological resources represent a limited, nonrenewable, sensitive scientific and educational resource. The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. Therefore, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations makes it possible to predict where fossils will or will not be encountered.

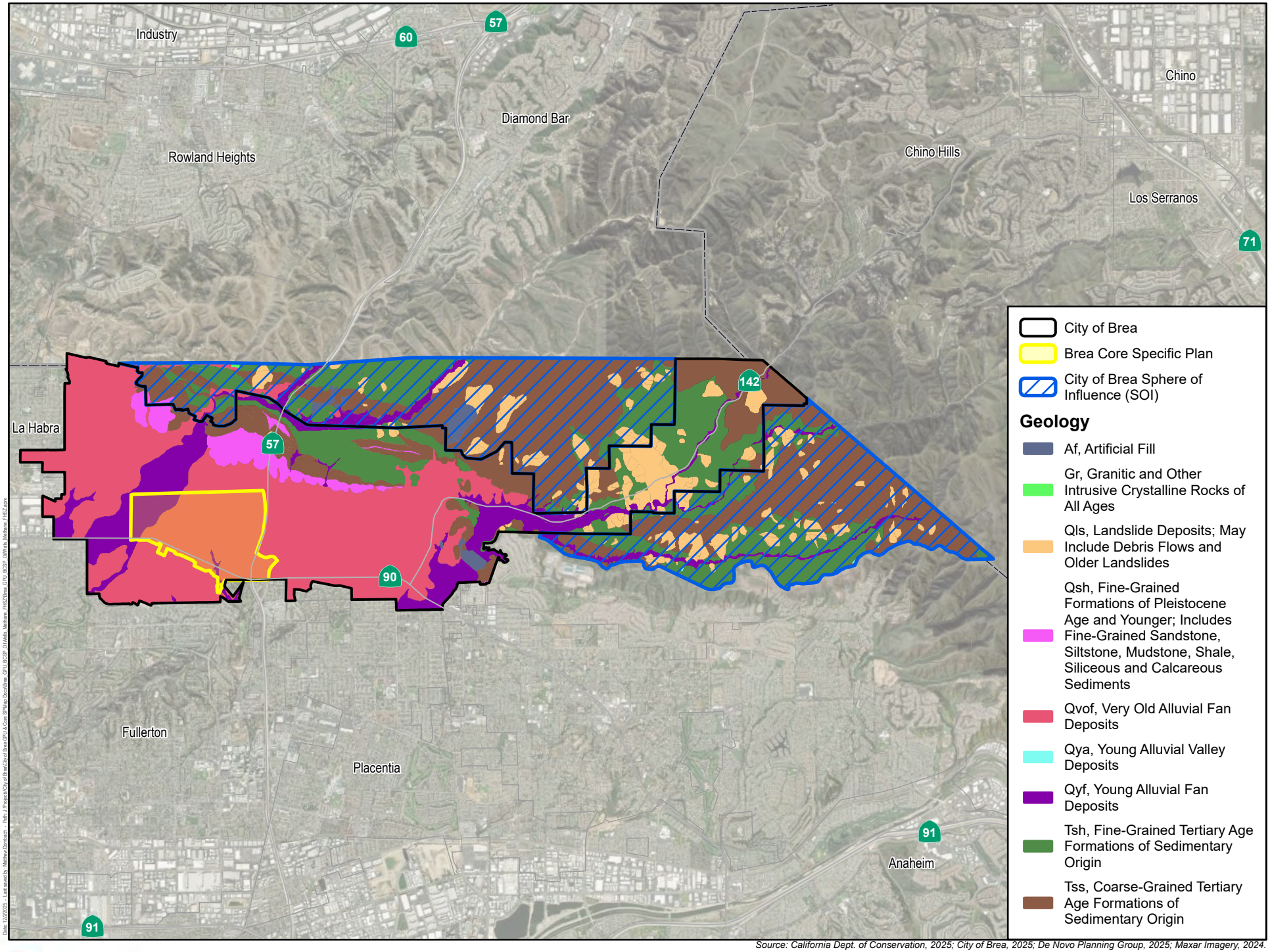
Paleontological Resources in Brea

As shown on Figure 4.6-1, Geologic Soil Types, the Project area is composed of nine geologic units. Table 4.6-1, Brea Soil Types and Age, summarizes the underlying soil types and their descriptions, and Table 4.6-2, Geologic Time Scale, provides the chronological framework for classifying geologic formations and fossil ages.

Table 4.6-1. Brea Soil Types and Age

Formation/Unit Symbol	Age	Description
Quaternary (Q) Units (Holocene and Pleistocene)		
Young Alluvial Fan Deposits (Qyf); Very Old Alluvial Fan Deposits (Qvof)	Late Pleistocene- to early Holocene-aged	The late Pleistocene- to early Holocene-aged older alluvium is composed of silty to sandy clays and clayey to silty sands. The older alluvium is firm and medium dense to dense and stiff, slightly moist to moist, and predominantly dark reddish to yellowish brown.
Young Alluvial Valley Deposits (Qya)	Holocene	Unconsolidated and undissected surficial sediments of valley fill and floodplains. These deposits consist of clay and silt, grading to sandy gravel near mountains.
Quaternary surficial deposits/Quaternary surficial deposits (Qsh)	Pleistocene age and younger	Fine-grained formations of Pleistocene age and younger; includes fine-grained sandstone, siltstone, mudstone, shale, siliceous and calcareous sediments. They are distinguished from other Quaternary units like active alluvium (Qaa) or older landslide deposits (QTs).
Landslide Debris (Qls)	Derived from Fernando Formation	Landslide deposits are classified as Quaternary (Q) in age because the process of mass wasting is continuous. While some Qls may be ancient (Pleistocene), many are considered recent (Holocene) or even modern/active. Derived from the siltstone member of the Fernando Formation, so the material would predominantly be siltstone and clayey siltstone fragments.
Artificial Fill (af)/Engineered and Documented	Undocumented Fills and Engineered Fills	Undocumented refers to materials that have been placed by human activity rather than by natural geologic processes. These materials have been excavated and imported from off-site or and/or generated from on-site cuts (e.g., grading a slope), and placed without controlled, engineered methodology. Engineered artificial fill are placed as part of past development. Unlike Undocumented Artificial Fill, Engineered Fill is a controlled product designed to meet or exceed minimum structural requirements.
Tertiary (T) Units (Pliocene and Miocene)		
Tertiary Sandstone and Shale (Tsh)	Tertiary (Paleogene or Neogene, such as Oligocene or Eocene)	Composed of fine-grained clastic sedimentary rocks. Its precise age and lithology are highly regional, but it suggests ancient marine or lacustrine (lake) deposits.
Coarse-Grained Tertiary Age Formations of Sedimentary Origin (Tss)	Tertiary (Paleogene or Neogene)	Dominated by sand-sized clastic grains, typically quartz or feldspar. It often represents ancient deltaic, fluvial (river), or nearshore marine environments.
Granitic and Other Intrusive Crystalline Rocks of All Ages (Gr)	All ages	Coarse-grained, intrusive igneous rocks like granite, granodiorite, and diorite, which form deep underground from slowly cooling magma, making them crystalline, diverse in age, and common in continental crust, often appearing pink or speckled on maps.

Sources: Cogstone 2021; CGS 2010; CSG 2025.



Source: California Dept. of Conservation, 2025; City of Brea, 2025; De Novo Planning Group, 2025; Maxar Imagery, 2024.

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Figure 4.6-1

Geologic Soil Types

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Table 4.6-2. Geologic Time Scale

Era	Period	Subperiod	Epoch
Cenozoic	Quaternary		Holocene
			Pleistocene
	Tertiary	late (Neogene)	Pliocene
			Miocene
		early (Paleogene)	Oligocene
			Eocene
			Paleocene
Mesozoic	Cretaceous		Late
			Early
	Jurassic		Late
			Middle
			Early
	Triassic		Late
			Middle
			Early
Paleozoic	Permian		Late
			Middle
			Early
	Carbonif.	Penn.	Late
			Middle
			Early
		Miss.	Late
			Middle
			Early
	Devonian		Late
			Middle
			Early
	Silurian		Late
			Early
	Ordovician		Late
			Middle
			Early
	Cambrian		Late
			Middle
			Early

Table 4.6-2. Geologic Time Scale

Era	Period	Subperiod	Epoch
Precamb**	Proterozoic**		Late*
			Middle*
			Early*
	Archean**		

Source: USGS 2025.

Notes:

* Era

** Eon

The Project area's geologic units range from the Miocene to the Holocene epochs (approximately 23 million years ago to 11,700 years ago). As shown on Figure 4.6-1, most of the Project area is underlain by Quaternary (Q) units consisting of recent alluvium of Holocene and Pleistocene age, characterized by surficial, unconsolidated deposits associated with river systems, erosion, and coastal-plain sedimentation. Tertiary (T) units of Pliocene and Miocene age also occur, particularly within the Puente Hills.

Within the incorporated City boundaries, the predominant units are Very Old Alluvial Fan Deposits (Qvof) and Young Alluvial Fan Deposits (Qyf). Within the Sphere of Influence north of the Whittier Fault Zone, the area is primarily underlain by Fine-Grained Tertiary-Age Formations of Sedimentary Origin (Tsh), Coarse-Grained Tertiary-Age Formations of Sedimentary Origin (Tss), and Landslide Deposits (Qls). The Puente Hills are underlain by the Puente Formation, a late Miocene fossiliferous unit composed primarily of diatomaceous shales that also contain vertebrate fossils. The Puente Formation has yielded abundant fossil specimens, including whales, porpoises, fish, sea lions, shark teeth, terrestrial plants, and marine invertebrates. Additionally, significant vertebrate fossils (e.g., land mammals and birds) have been documented within Quaternary (Pleistocene and Holocene) terrestrial deposits throughout Orange County (City of Brea 2003). Geologic units dating from the Pleistocene epoch and older generally have moderate to high potential to contain paleontological resources at depth.

Brea Core Specific Plan

As shown on Figure 4.6-1, the BCSP area is underlain by Very Old Alluvial Fan Deposits (Qvof) and Young Alluvial Fan Deposits (Qyf), which are late Pleistocene- to early Holocene-aged geologic units. Holocene alluvium is generally considered too young to contain fossilized vertebrate remains because permineralization and long-term burial conditions have not occurred; therefore, Qyf is typically classified as having low paleontological sensitivity. However, late Pleistocene alluvium (11,700 to approximately 2.6 million years ago) throughout Southern California has yielded significant vertebrate fossils, including mammoth, horse, camel, and other extinct megafauna. Accordingly, undisturbed Pleistocene deposits are generally assigned high paleontological sensitivity.

4.6.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact on geology and soils if it would:

- **Threshold GEO-a:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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.
  - Strong seismic ground shaking.
  - Seismic-related ground failure, including liquefaction.
  - Landslides.
- **Threshold GEO-b:** Result in substantial soil erosion or the loss of topsoil.
- **Threshold GEO-c:** Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- **Threshold GEO-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.
- **Threshold GEO-e:** Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
- **Threshold GEO-f:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Chapter 5 of this PEIR determined that the following thresholds would have less than significant or no impact, and these environmental topics will not be addressed further in this section of the PEIR.

- Threshold GEO-a
- Threshold GEO-b
- Threshold GEO-c
- Threshold GEO-d
- Threshold GEO-e

4.6.3 Plans, Programs, and Policies

There are no plans, programs, or policies applicable to the Proposed Project that would reduce or avoid potential impacts on paleontological resources.

4.6.4 Environmental Impacts

The following sections address various potential impacts relating to geology and soils that could result from implementation of the Proposed Project.

4.6.4.1 Threshold GEO-f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis

Focused General Plan Update

Paleontological resources consist of the fossilized remains or traces of prehistoric plant and animal life (excluding humans). These resources are nonrenewable and are protected under the California Public Resources Code, Section 5097.5. The Focused GPU includes Policy CR-5.2, Archaeological and Paleontological Resources, which calls for evaluating the significance of any discovered archaeological or paleontological resources based on cultural relevance, physical condition, economic factors, feasibility, and other key considerations. However, the Focused GPU does not include implementation actions or standards that specifically require the identification or protection of paleontological resources during development.

As discussed in Section 4.6.1.2, the Project area includes soil types that could contain paleontological resources. Adoption of the Focused GPU would not, by itself, result in physical ground disturbance or direct effects on such resources. However, buildout under the updated land use plan would involve grading and excavation associated with new development and redevelopment. Ground-disturbing activities—particularly in previously undeveloped areas or in locations where future projects may require deeper excavation than historic development—could disturb or destroy known or previously unrecorded paleontological resources.

The presence or absence of paleontological resources cannot be confirmed until site-specific geologic investigations are conducted and the extent of ground disturbance is known. As a result, inadvertent discovery and potential damage to paleontological resources could occur during development facilitated by the Focused GPU. Therefore, impacts to paleontological resources would be potentially significant before implementation of mitigation.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measure MM GEO-1 is required.

Level of Significance After Mitigation: Less than significant.

Brea Core Specific Plan

As discussed in Section 4.6.1.2, the BCSP area is underlain by Very Old Alluvial Fan Deposits (Qvof) and Young Alluvial Fan Deposits (Qyf), which are late Pleistocene- to early Holocene-

aged geologic units. Paleontological resources could occur in areas underlain by Very Old Alluvial Fan Deposits (Qvof). Although the BCSP area is already developed, future development and redevelopment would involve grading and excavation that could disturb or destroy known or previously unrecorded paleontological resources. Because the presence or absence of paleontological resources cannot be confirmed until site-specific geologic investigations are conducted and the extent of ground disturbance is known, there is potential for previously unidentified resources to be discovered. Therefore, impacts would be potentially significant before implementation of mitigation.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measure MM GEO-1 is required.

Level of Significance After Mitigation: Less than significant.

4.6.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to paleontological resources that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.6.5.1 Cumulative Threshold GEO-f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Focused General Plan Update and Brea Core Specific Plan

As defined in Section 15130 of the CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for paleontological resources. The study area for the assessment of cumulative impacts related to paleontological resources is defined as the City's Project area and, therefore, is inherently cumulative. As discussed in Section 4.6.4.1, the buildout of the Focused GPU, including the buildout of the BCSP, could result in potentially significant impacts to paleontological resources, and implementation of Mitigation Measure MM GEO-1 would also reduce impacts on paleontological resources to less than significant levels. Impacts could be cumulatively considerable without mitigation.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measure MM GEO-1 is required.

Level of Significance After Mitigation: Less than significant.

4.6.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold GEO-f are potentially significant without mitigation.

4.6.7 Mitigation Measures

MM GEO-1 Prior to issuance of a grading permit for any project that would involve ground-disturbing activities greater than current foundations present on a given site underlain by Quaternary (Pleistocene and Holocene) terrestrial deposits or older geologic units, or within areas identified as having high or undetermined paleontological sensitivity, the project proponent shall retain a qualified professional paleontologist meeting the qualifications of the Society of Vertebrate Paleontology to conduct an evaluation to determine the paleontological sensitivity of the geologic units affected by the project and whether ground-disturbing activities would result in a significant impact to paleontological resources according to current Society of Vertebrate Paleontology guidelines. The evaluation shall be submitted to the City of Brea Community Development Department for review and approval.

If evaluation determines that the project has the potential to impact paleontological resources, the City of Brea shall require implementation of paleontological mitigation measures recommended by the qualified professional paleontologist to reduce potential impacts to paleontological resources to a less than significant level. These measures may include but not be limited to implementation of a Worker Environmental Awareness Program, on-site paleontological monitoring, and fossil salvage and treatment plans, if applicable. If paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified professional paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the City of Brea to protect the discovered resources. Any paleontological resources recovered shall be provided for curation at a local curation facility such as the Dr. John D. Cooper Archaeological and Paleontological Center or other appropriate repository. The City of Brea Community Development Department shall review and approve the qualified professional paleontologist's findings and recommendation.

4.6.8 Level of Significance After Mitigation

Threshold GEO-f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

With implementation of Mitigation Measure MM GEO-1, paleontological resources impacts related to Threshold GEO-f would be less than significant. No significant and unavoidable impacts would remain.

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4.7 Greenhouse Gas Emissions

This section evaluates the potential for impacts on greenhouse gas (GHG) emissions resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.7.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to GHG emissions.

4.7.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address GHG emissions.

Federal

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (USEPA) is responsible for implementing Federal policy to address global climate change. In 2009, the USEPA issued a final rule for mandatory reporting of GHG emissions, which applies to fossil fuel and industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and requires annual emissions reporting. This rule does not regulate the emission of GHGs; it only requires the monitoring and reporting of GHG emissions for those sources above certain thresholds.

Corporate Average Fuel Economy Standards

The Corporate Average Fuel Economy standards were first enacted in 1975 to improve the average fuel economy of cars and light-duty trucks. The standards have been modified several times to cover additional model years, incorporating increasingly stringent standards over time. Standards for model years 2027–2031 were finalized in 2024. In this final rule, fuel economy is estimated to increase 2 percent per year for model years 2027–2031 for passenger cars, while light-duty trucks will increase 2 percent per year for model years 2029–2031. These increases will bring the average light-duty vehicle fuel economy up to approximately 50.4 miles per gallon by model year 2031 (NHTSA 2024). Most recently, in 2025, the National Highway Traffic Safety Administration announced that Corporate Average Fuel Economy standards were under review; however, no changes to existing standards have been proposed (NHTSA 2025). While the standards remain in place, Congress amended 49 U.S.C. Section 32912 in July 2025 to effectively eliminate the penalty for violating the Corporate Average Fuel Economy standards for passenger cars and light-duty trucks. (Public Law No. 119-21).

State

Executive Order S-3-05: Greenhouse Gas Emissions Reduction Targets

On June 1, 2005, Governor Arnold Schwarzenegger announced, through Executive Order (EO) S-3-05, the following GHG emissions targets:

- By 2010, California shall reduce GHG emissions to 2000 levels.
- By 2020, California shall reduce GHG emissions to 1990 levels.
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

EO S-3-05 also laid out State agencies' responsibilities for implementation and reporting on progress toward these targets.

Assembly Bill 32 and Senate Bill 32: California Global Warming Solutions Act

Assembly Bill (AB) 32 requires the California Air Resources Board (CARB) to reduce Statewide GHG emissions to 1990 levels by 2020. As part of this legislation, CARB was required to prepare a "Scoping Plan" that demonstrates how the State will achieve this goal. The first Scoping Plan was adopted in 2008 and describes local governments as "essential partners" in meeting the Statewide goal, recommending a GHG reduction level 15 percent below 2005–2008 levels (depending on when a full emissions inventory is available) by 2020.

Executive Order B-30-15: 2030 Greenhouse Gas Emissions Reduction Target

On April 29, 2015, Governor Jerry Brown announced through EO B-30-15 the following GHG emissions target:

- By 2030, California shall reduce GHG emissions to 40 percent below 1990 levels.

The emissions reduction target of 40 percent below 1990 levels by 2030 is an interim-year goal to make it possible to reach the ultimate goal of reducing emissions 80 percent under 1990 levels by 2050. The EO directs CARB to provide a plan with specific regulations to reduce Statewide sources of GHG emissions. EO B-30-15 does not include a specific guideline for local governments.

Executive Order B-55-18

In 2018, EO B-55-18 established a new Statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." This target has been codified in AB 1279, described below.

Assembly Bill 1279

AB 1279, the California Climate Crisis Act, enacted in September 2022, updates the goals of AB 32. AB 1279 established a Statewide goal to achieve net-zero GHG emissions by 2045 and achieve and maintain net-negative GHG emissions thereafter. Additionally, AB 1279 established a specific

target for Statewide anthropogenic GHG emissions to be reduced to at least 85 percent below 1990 levels by 2045. AB 1279 requires CARB to work with relevant State agencies to ensure that updates to the Scoping Plan identify and recommend measures to achieve these policy goals and identify and implement a variety of policies and strategies that enable carbon dioxide (CO_2) removal solutions and carbon capture, utilization, and storage technologies in California, as specified. AB 1279 also requires CARB to submit an annual progress report.

2022 Scoping Plan for Achieving Carbon Neutrality

As directed by AB 32, CARB adopted the first Climate Change Scoping Plan (Scoping Plan) in December 2008, in accordance with California Health and Safety Code, Section 38561. The Scoping Plan included measures to address GHG emissions reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The Scoping Plan was updated in 2014, 2017, and most recently in 2022.

The most recent update to the Scoping Plan was adopted by CARB in December 2022 (2022 Scoping Plan). The 2022 Scoping Plan assesses progress toward the statutory 2030 target of at least 40 percent below 1990 emissions and identifies a path to achieving carbon neutrality by 2045, consistent with AB 1279 targets described above. The 2022 Scoping Plan identifies reductions for each GHG emission sector (e.g., the transportation, industry, electricity generation, agriculture, commercial and residential, and waste sectors) to achieve these goals. For each of these sectors, the 2022 Scoping Plan also describes strategies for GHG emissions reductions (CARB 2022).

Assembly Bill 341: Commercial Recycling

AB 341 sets a Statewide goal of 75 percent recycling, composting, or source reduction of solid waste by the year 2020. As required by AB 341, the California Department of Resources Recycling and Recovery (CalRecycle) adopted the Mandatory Commercial Recycling Regulation on January 17, 2012. The regulation was approved by the Office of Administrative Law on May 7, 2012. It became effective immediately and clarified the responsibilities in implementing mandatory commercial recycling. The Mandatory Commercial Recycling Regulation focuses on increased commercial waste diversion as a method to reduce GHG emissions. The regulation is designed to achieve a 5 million metric tons (MMT) of CO_2 reduction in GHG emissions, which equates to roughly an additional 2–3 metric ton[1] (MT) CO_2 of currently disposed commercial solid waste being recycled by 2020 and thereafter.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the California Energy Commission (CEC) to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other State,

[1] A metric ton is equal to approximately 1.1 tons.

Federal, and local agencies. The State Alternative Fuels Plan presents strategies and actions that California must take to increase the use of alternative nonpetroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-State production. The State Alternative Fuels Plan assesses various alternative fuels and develops fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

Assembly Bill 1493: Clean Car Standards

Also known as "Pavley I," AB 1493 standards were the nation's first GHG standards for automobiles. AB 1493 requires CARB to adopt vehicle standards that lower GHG emissions from new light-duty automobiles to the maximum extent feasible. In January 2012, CARB adopted the Advanced Clean Cars Program to achieve additional GHG emissions reductions for passenger vehicles for model years 2017–2025. The program includes Low Emission Vehicle regulations and zero-emission vehicle (ZEV) regulations. Together, the two standards increased average fuel economy to roughly 43 miles per gallon in 2020 (and more for years beyond 2020). The Advanced Clean Cars II Program (ACC II) was adopted by CARB in August 2022, and provides the regulatory framework for ensuring the sales requirement goal of 100 percent ZEV sales in the State by 2035, consistent with EO N-79-20. The USEPA granted CARB's Clean Air Act (CAA) waiver for implementing ACC II on December 2024. On June 12, 2025, Public Law No. 119-16 rescinded the USEPA's December 2024 CAA waiver for ACC II. The impacts of P.L. No. 119-16 are uncertain pending the outcome of litigation challenging the rescission, discussed below.

The Federal CAA allows States to adopt ambient air quality standards and other regulations if they are at least as stringent as Federal standards. However, in 2025 the U.S. Congress attempted to rescind California's ability to set stricter emissions standards through the Congressional Review Act (refer to Public Laws 119-15 through 119-17). This action was made in contravention of the Senate Parliamentarian's conclusion the action was not allowed under the Congressional Review Act. Consequently, on June 12, 2025, California and a coalition of ten other States filed a lawsuit challenging these actions. (State of California et al. v. United States et al., No. 4:25-cv-04966-HSG [N.D. Cal]). The implications of these laws on the State's ability to enforce its California Ambient Air Quality Standards are uncertain pending the outcome of this litigation.

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The Act established State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission regulates privately owned utilities in the energy, rail, telecommunications, and water fields.

California Code of Regulations Title 24, Part 6

California Code of Regulations, Title 24, Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings), was established in 1978 to reduce California's energy consumption. The Standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although the Standards were not originally intended to reduce GHG emissions, electricity production by fossil fuels and natural gas use result in GHG emissions, and energy-efficient buildings require less electricity and natural gas. Therefore, increased energy efficiency results in decreased GHG emissions.

The CEC adopted its 2008 Standards on April 23, 2008, in response to AB 32. The 2008 Standards were adopted to (1) provide California with an adequate, reasonably priced, and environmentally sound supply of energy; (2) pursue California energy policy, which states that energy efficiency is the resource of first choice for meeting California's energy needs; (3) meet the West Coast Governors' Global Warming Initiative commitment to include aggressive energy efficiency measures into updates of State building codes every 3 years; and (4) meet the requirements of EO B-18-12 and those in the Green Building Initiative to improve the energy efficiency of non-residential buildings through aggressive standards.

The 2022 Standards that went into effect on January 1, 2023, encouraged efficient electric heat pumps, established electric-ready requirements for new homes, expanded solar photovoltaic and battery storage standards, and strengthened ventilation standards. The 2025 Building Energy Efficiency Standards went into effect on January 1, 2026. The 2025 Standards emphasize the use of heat pumps for space heating and water heating, as well as photovoltaic and battery storage systems. The 2025 Standards also strengthen ventilation standards to improve indoor air quality.

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

The California Green Building Standards Code (CALGreen) contains mandatory requirements for new residential and non-residential buildings throughout California. The CALGreen Code is Part 11 of the California Building Standards Code in Title 24 of the California Code of Regulations.

CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the governor's directives. The Code was established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impacts during and after construction. The Code includes Construction Waste Management Requirements that require projects to recycle and/or salvage at least 65 percent of their nonhazardous construction and demolition waste. The 2022 CALGreen standards for new construction of and additions and alterations to residential and non-residential buildings went into effect on January 1, 2023, and the 2025 CALGreen standards went into effect on January 1, 2026,

building on the 2022 standards. Changes to non-residential mandatory measures include revisions to calculations for bicycle parking requirements and changes to electric vehicle (EV) charging specifications.

Executive Order N-79-20: Zero-Emission Vehicles

EO N-79-20, signed by Governor Gavin Newsom on September 23, 2020, directs the State to require that, by 2035, all new cars and passenger trucks sold in California be ZEV to reduce transportation GHG emissions, the primary source of emissions in the State. Following the EO, CARB will develop regulations to mandate that 100 percent of in-State sales of new passenger cars and trucks are zero emission by 2035 and that all operations of medium- and heavy-duty vehicles shall be 100 percent zero emission by 2045 where feasible. Final details for achieving the goal are not available, but CARB has several existing programs to encourage ZEV adoption, including the Carl Moyer Program and Low Carbon Transportation Program. The Carl Moyer Program provides incentives for replacing existing vehicles and equipment with the cleanest available technology, and the Low Carbon Transportation Program focuses on advancing technologies through zero-emission demonstration projects and supports deployment of on-road zero-emission technologies (CARB 2026a, 2026b). The Advanced Clean Cars II (ACC II) Program, discussed above, provides the regulatory framework for ensuring the sales requirement goal of EO N-79-20. The USEPA granted CARB its California's CAA waiver request on December 18, 2024; however, as noted above, P.L. 119-16 rescinded California's waiver under the CAA.

Executive Order S-01-07: Low Carbon Fuel Standard

In 2007, Governor Arnold Schwarzenegger signed EO S-01-07, which mandates (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and (2) that a low carbon fuel standard for transportation fuels be established in California. CARB developed the low carbon fuel standard regulation pursuant to the State's authority under AB 32 and the Federal CAA and adopted it in 2009.

Executive Order S-06-06: Biofuel and Biopower Production Targets

EO S-06-06, signed on April 25, 2006, by Governor Arnold Schwarzenegger, establishes targets for the use and production of biofuels and biopower, and directs State agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO S-06-06 establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels within California by 2010, 40 percent by 2020, and 75 percent by 2050. The EO S-06-06 also calls for the State to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so the State can meet its clean energy, waste reduction, and climate protection goals.

The 2012 Bioenergy Action Plan updates the 2011 plan and provides a more detailed action plan to achieve the following goals (BIWG 2012):

- Increase environmentally and economically sustainable energy production from organic waste;
- Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications;
- Create jobs and stimulate economic development, especially in rural regions of the State; and
- Reduce fire danger, improve air and water quality, and reduce waste.

As of 2024, 1.94 percent of the total electricity system power in California was derived from biomass.

Senate Bill 97: California Environmental Quality Act Greenhouse Gas Emissions

SB 97, enacted in 2007, amends the California Environmental Quality Act (CEQA) statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. The legislation directed the California Governor's Office of Planning and Research (now known as the Governor's Office of Land Use and Climate Innovation) to develop Draft CEQA Guidelines "for the mitigation of GHG emissions or the effects of GHG emissions" and directed the resources agency to certify and adopt the CEQA Guidelines. CEQA Guidelines, Section 15183.5, Tiering and Streamlining the Analysis of GHG Emissions, was added as part of the CEQA Guidelines amendments that became effective in 2010 and describes the criteria needed in a GHG reduction plan that would allow for tiering and streamlining of CEQA analysis for development projects.

California Renewables Portfolio Standards Program

The California Renewables Portfolio Standards (RPS) program was established in 2002 under Senate Bill (SB) 1078 and accelerated in 2006 under SB 107 by requiring that 20 percent of electricity retail sales be served by renewable energy sources by 2010. Subsequent recommendations in California energy policy reports advocated a goal of 33 percent by 2020, and on November 17, 2008, Governor Schwarzenegger signed EO S-14-08, requiring electricity retailers to serve 33 percent of their load with renewable energy by 2020. In April 2011, SB X1-2 codified EO S-14-08, setting the new RPS targets at 20 percent by the end of 2013, 25 percent by the end of 2016, and 33 percent by the end of 2020 for electricity retailers. Subsequently, Governor Brown signed SB 350 in October 2015, which extended the RPS target by requiring retail sellers to procure 50 percent of their electricity from renewable energy resources by 2030.

Governor Jerry Brown signed SB 100 in 2018, which replaced the SB 350 requirement of 45 percent renewable energy by 2027 with the requirement of 50 percent by 2026 and raises

California's RPS requirements for 2050 from 50 to 60 percent. SB 100 also established RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Furthermore, the bill also established an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end users and 100 percent of electricity procured to serve State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020 was approved in September 2022. This bill revised energy targets to provide that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035; 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040; 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045; and 100 percent of electricity procured to serve all State agencies by December 31, 2035.

Assembly Bill 130/Senate Bill 131

AB 130 and SB 131, signed into effect in June 2025, are intended to streamline CEQA review of new housing development. The bills expanded CEQA exemptions for qualifying housing projects, specifically new infill development. AB 130 also included limitations of local jurisdictions' ability to update building codes to apply more restrictive standards to housing development, including green building standards, effective October 1, 2025, through June 1, 2031.

Senate Bill 375: Sustainable Communities Strategy

SB 375 was adopted in 2008 and provides a new planning process that coordinates land use planning, Regional Transportation Plans, and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires Regional Transportation Plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a Sustainable Communities Strategy in their Regional Transportation Plans. The goal of the Sustainable Communities Strategy is to reduce regional vehicle miles traveled (VMT) through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as transit-oriented development.

Regional/Local

SCAG's 2024–2050 RTP/SCS

SB 375, as described above, required the MPOs to prepare a Sustainable Communities Strategy in their Regional Transportation Plans. On April 4, 2024, Southern California Association of Governments' (SCAG's) Regional Council adopted Connect SoCal 2024 (2024–2050 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]). On May 10, 2024, the

Federal Highway Administration and Federal Transit Administration approved Connect SoCal 2024, and CARB approved in May 2025. Connect SoCal charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, Tribal governments, non-profit organizations, businesses, and local stakeholders, within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Connect SoCal is a long-range vision plan that balances future mobility and housing needs with economic and environmental goals. The SCAG region strives toward sustainability through integrated land use and transportation planning.

The SCAG region must achieve specific Federal air quality standards and is required by State law to lower regional GHG emissions. Connect SoCal aims to deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel-time reliability, air quality, economic productivity, environmental justice, and transportation asset condition. Connect SoCal 2024 establishes GHG emissions goals for automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by CARB (Government Code, Section 65080(b)(2)(B)) (i.e., for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post 2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15 and the Connect SoCal 2045 target for the SCAG region is 19 percent below 2005 per capita emissions levels by 2035).

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) has adopted a significance threshold of 10,000 metric ton carbon dioxide equivalent (MT CO_2e) per year for permitted (stationary) sources of GHG emissions for which it is the designated lead agency. To provide guidance to local lead agencies on determining the significance of GHG emissions in CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting (Meeting No. 15) in September 2010, SCAQMD identified a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency (SCAQMD 2010a). As of 2025, the tiered approach has not been formally adopted by SCAQMD.

- **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 (e.g., 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. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The SCAQMD Working Group identified that because construction activities would result in a "one-time" net increase in GHG emissions, construction activities should be amortized into the operational phase GHG emissions inventory based on the service typical interval before a new building requires the first major renovation. The SCAQMD identified a screening-level threshold of 3,000 MT CO_2e annually for all land use types. This bright-line screening-level threshold is based on a review of the database of CEQA projects from the Governor's Office of Land Use and Climate Innovation. Based on review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line threshold. Therefore, projects that do not exceed the bright-line threshold would have a nominal, less than cumulatively considerable impact on GHG emissions. Although three thresholds were identified, SCAQMD recommends use of 3,000 MT CO_2e per year (MT CO_2e/year) for all project types (SCAQMD 2010b).

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted. South Coast AQMD identified an efficiency target for projects that exceed the bright-line threshold: a 2020 efficiency target of 4.8 MT CO_2e per year per service population (MT CO_2e/year/SP) for project-level analyses and 6.6 MT CO_2e/year/SP for plan-level projects (e.g., general plans). Service population is generally defined as the sum of residential and employment population of a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.

4.7.1.2 Existing Conditions

Global Climate Change Overview

Climate change refers to any substantial change in measures of climate (such as temperature, precipitation, or wind) lasting for decades or longer. Earth's climate has changed many times during the planet's history, including events ranging from ice ages to long periods of warmth. Historically, natural factors, such as volcanic eruptions, changes in Earth's orbit, and the amount of energy released from the sun, have affected Earth's climate. Some GHGs, such as water vapor, occur naturally and are emitted to the atmosphere through natural processes, while others are emitted through human activities. Beginning in the late 18th century, human activities associated with the Industrial Revolution changed the composition of the atmosphere and, therefore, very likely influenced Earth's climate.

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without the natural heat-trapping effects of GHGs, Earth's temperature would be approximately 86 degrees Fahrenheit

(°F) cooler (Riebeek 2010). However, it is believed that emissions from human activities, such as electricity production and vehicle use, have elevated the concentration of GHGs in the atmosphere beyond the level of naturally occurring concentrations.

The Global Carbon Project released an update of the global carbon budget for the year 2023. The atmospheric CO_2 concentration in 2023 was 419 parts per million, 52 percent above the concentration at the start of the Industrial Revolution (about 278 parts per million in 1750). Total anthropogenic emissions have been stable over the last decade (zero growth rate over the 2014–2023 period) and much slower than over the previous decade (2004–2013), with an average growth rate of 2 percent per year (Earth Systems Science Data 2025).

Greenhouse Gases

GHGs are present in the atmosphere naturally, released by natural sources, or formed from secondary reactions taking place in the atmosphere. The following gases are widely seen as the principal contributors to human-induced global climate change:[2]

- CO_2
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions increase GHG concentrations in the atmosphere and enhance the natural greenhouse effect, which scientists believe can cause global warming. While GHGs produced by human activities include naturally occurring GHGs (e.g., CO_2, CH_4, and N_2O), some gases (e.g., HFCs, PFCs, and SF_6) are completely new to the atmosphere. Certain other gases (e.g., water vapor) are short lived in the atmosphere compared to these GHGs, which remain in the atmosphere for significant periods of time and contribute to climate change in the long term. Water vapor is generally excluded from the list of GHGs because it is short lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes (e.g., oceanic evaporation). For the purposes of this Program Environmental Impact Report (PEIR), the term "GHGs" will refer collectively to the six gases identified in the bulleted list provided above. The following discussion summarizes the characteristics of the six primary GHGs.

[2] The GHGs listed are consistent with the definition in AB 32 (California Government Code, Section 38505), as discussed in this section.

Carbon Dioxide

In the atmosphere, carbon generally exists in its oxidized form as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals, and plants; volcanic outgassing; decomposition of organic matter; and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Earth maintains a natural carbon balance, and when concentrations of CO_2 are upset, the system gradually returns to its natural state through natural processes. Natural changes to the carbon cycle work slowly, especially compared to the rapid rate at which humans are adding CO_2 to the atmosphere. Natural removal processes (e.g., photosynthesis by land- and ocean-dwelling plant species) cannot keep pace with this extra input of human-made CO_2, and consequently, the gas is building up in the atmosphere. The concentration of CO_2 in the atmosphere has risen approximately 30 percent since the late 1800s.

Methane

CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources of CH_4 include fires, geologic processes, and bacteria that produce CH_4 in a variety of settings (most notably wetlands). Anthropogenic sources include rice cultivation, livestock, landfills and waste treatment, biomass burning, and fossil fuel combustion (e.g., the burning of coal, oil, and natural gas). As with CO_2, the major removal process of atmospheric CH_4 (a chemical breakdown in the atmosphere) cannot keep pace with source emissions, and CH_4 concentrations in the atmosphere are increasing.

Nitrous Oxide

N_2O is produced naturally by a variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. N_2O is also a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion sources emit N_2O. The quantity of N_2O emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in the State.

Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride

HFCs are primarily used as substitutes for ozone (O_3)-depleting substances regulated under the Montreal Protocol.[3] PFCs and SF_6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. No aluminum or magnesium production occurs in the State of California;

[3] The Montreal Protocol is an international treaty that was approved on January 1, 1989, and was designated to protect the O_3 layer by phasing out the production of several groups of halogenated hydrocarbons that are believed to be responsible for O_3 depletion and are also potent GHGs.

however, rapid growth in the semiconductor industry, which is active in the State, has led to greater use of PFCs.

Global Warming Potential

The GHGs described previously 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 GHG. GWP is based on several factors, including the relative effectiveness of a GHG in absorbing infrared radiation and the length of time that the GHG remains in the atmosphere (referred to as "atmospheric lifetime"). The GWP of each GHG 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 MT[4] of CO_2e. For example, N_2O is 298 times more potent at contributing to global warming than CO_2. Table 4.7-1, Global Warming Potential for Selected Greenhouse Gases, identifies the GWP for each relevant GHG.

Table 4.7-1. Global Warming Potential for Selected Greenhouse Gases

Pollutant	Atmospheric Lifetime (Years)	GWP (100-Year)[2]
CO_2	~100[1]	1
CH_4	12	28
N_2O	121	298

Source: CAPCOA 2022.

Notes: CH_4 = methane; CO_2 = carbon dioxide; GWP = global warming potential; N_2O = nitrous oxide

[1] CO_2 has a variable atmospheric lifetime and cannot be readily approximated as a single number.

[2] The warming effects over a 100-year period relative to other GHGs.

Emissions and Inventories

Global Emissions

Worldwide anthropogenic GHG emissions in 2019 were approximately 59 billion MT CO_2e, including ongoing emissions from industrial and agricultural sources and emissions from land use changes (e.g., deforestation, biomass decay). Approximately 79 percent of global GHG emissions came from the energy, industry, transport, and buildings sectors. The remaining emissions were from agriculture, forestry, and other land use (IPCC 2023).

United States Emissions

In 2022, the United States emitted approximately 6.3 billion MT CO_2e. Total U.S. emissions increased by 1 percent from 2021 to 2022, but are 17 percent below 2005 levels. A contributor to the increase in total GHG emissions between 2021 and 2022 was an increase in fossil fuel

[4] A metric ton is equal to approximately 1.1 tons.

consumption, due in part to the rebound in economic activity after the height of the COVID-19 pandemic (USEPA 2025e).

State of California Emissions

The CARB is responsible for developing the State GHG Emission Inventory. This inventory estimates the amount of GHGs emitted to and removed from the atmosphere by human activities in the State and supports the AB 32 Climate Change Program. CARB's current GHG emission inventory is based on fuel use, equipment activity, industrial processes, and other relevant data (e.g., housing, landfill activity, and agricultural lands).

According to CARB emission inventory estimates, the State emitted approximately 371.1 MMT CO_2e emissions in 2022. This is a decrease of 9.3 MMT CO_2e from 2021. Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. CARB estimates that transportation was the source of approximately 38 percent of the State's GHG emissions in 2022, followed by industrial sources at 20 percent and electricity generation at 16 percent. The largest emissions category in the transportation sector is On-Road Transportation, which consists of passenger vehicles (cars, motorcycles, and light-duty trucks) and heavy-duty vehicles. The remaining sources of GHG emissions were residential and commercial activities at 11 percent, agriculture at 8 percent, and the remaining emissions from refrigerants, solid waste, and other sources (CARB 2024).

City of Brea Emissions

Existing Citywide operational GHG emissions for existing development were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.33). Model default assumptions for the existing land use mix were assumed except for the Citywide VMT obtained from the City of Brea Focused General Plan Update and Brea Core Specific Plan: Transportation Analysis (Appendix H, VMT and Transportation Assessment) prepared by Kittelson & Associates, Inc. (2025). Refer to Table 4.7-2, Existing Focused General Plan Update Area GHG Inventory, for calculated existing greenhouse gas emissions.

Table 4.7-2. Existing Focused General Plan Update Area GHG Inventory

Emission Source	Emissions (MT CO_2e)
Area	6,477
Electricity	61,930
Natural Gas	41,350
Mobile	265,749
Waste	11,364
Water	11,364
Total Annual Existing Emissions	398,233

Source: Refer to Appendix D for model output.
Note: MT CO_2e = metric ton carbon dioxide equivalent

Brea Core Specific Plan Emissions

Existing GHG emissions for existing development in the BCSP were also estimated using CalEEMod based model default assumptions except for BCSP VMT data obtained from Kittelson & Associates, Inc. (2025). Refer to Table 4.7-3, Existing Brea Core Specific Plan Area GHG Inventory, for calculated existing greenhouse gas emissions.

Table 4.7-3. Existing Brea Core Specific Plan Area GHG Inventory

Emission Source	Emissions (MT CO_2e)
Area	586
Electricity	8,815
Natural Gas	2,466
Mobile	50,421
Waste	1,989
Water	1,056
Total Annual Existing Emissions	65,333

Source: Refer to Appendix D for model output.
Note: MT CO_2e = metric ton carbon dioxide equivalent

4.7.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Project would have a significant impact on GHG emissions if it would:

- **Threshold GHG-a:** Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Threshold GHG-b:** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.7.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and help reduce or avoid potential impacts related to greenhouse gas emissions:

PPP GHG-1 New buildings are required to achieve the California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11) in effect at the time of permit application for plan check. The 2025 Building Energy Efficiency Standards and the 2025 CALGreen became effective January 1, 2026.

PPP GHG-2 New buildings are required to adhere to the California Green Building Standards Code (CALGreen) requirement to provide bicycle parking and related facilities for new nonresidential buildings, or meet the Brea City Code bicycle parking and related facilities requirements, whichever is stricter.

PPP GHG-3 California's Green Building Standards Code (CALGreen) requires the recycling and/or salvaging for reuse at minimum of 65 percent of the nonhazardous construction and demolition waste generated during most "new construction" projects (CALGreen secs. 4.408 and 5.408). Construction contractors are required to submit a construction waste management plan that identifies the construction and demolition waste materials to be diverted from disposal by recycling, reused on the project, or salvaged for future use or sale and the amount (by weight or volume).

PPP GHG-4 Construction activities are required to adhere to Title 13 California Code of Regulations Section 2499, which requires that nonessential idling of construction equipment is restricted to five consecutive minutes or less.

PPP GHG-5 New buildings are required to adhere to the Brea City Code Title 14, Sustainable Provisions pertaining to water efficient landscaping requirements, small residential rooftop solar energy system, and electric vehicle charging stations.

4.7.4 Environmental Impacts

The following sections address various potential impacts relating to GHG emissions that could result from implementation of the Proposed Project.

4.7.4.1 Threshold GHG-a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact Analysis

CEQA Guidelines, Section 15064.4(b)(2), allows the City to determine a threshold of significance that applies to the Proposed Project. However, the City has not adopted a numeric threshold for the analysis of GHG impacts. Therefore, in accordance with CEQA Guidelines, Section 15064.7(c), the City uses the GHG threshold recommendations published by the SCAQMD, as the regional authority on pollutant emissions. To provide guidance to local lead agencies on determining the significance of GHG emissions in CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting (Meeting No. 15) in September 2010, SCAQMD identified a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency (SCAQMD 2010a), as discussed above.

For purposes of this analysis, the bright-line threshold of 3,000 MT CO_2e/year outlined in Tier 3 of the SCAQMD approach is used to screen for potential Proposed Project impacts. Where the screening level of 3,000 MT CO_2e/year is exceeded, the project is compared to an efficiency target consistent with Tier 4 of the SCAQMD guidance. The per capita efficiency target of 6.6 MT CO_2e/year/service population is based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan. An updated per capita target of 2 MT CO_2e was published in the 2017 CARB Scoping Plan to achieve the Statewide target of 80 percent below 1990 levels by 2050 (CARB 2017). The 2022 Scoping Plan does not include an updated per capita target. However, based on the 2017 Scoping Plan, an adjusted efficiency target of 1.5 MT CO_2e per service population is used in this analysis to reflect the revised AB 1279 target of an 85 percent reduction below 1990 levels.

Focused General Plan Update

Construction

Proposed Project's construction emissions were estimated using the CalEEMod version 2022.1.1.33. The Focused GPU is a land use policy plan and does not propose any specific construction projects and the details of future construction under the plan are currently unknown. It was assumed for the purposes of CEQA analysis for the Focused GPU that an equal amount of development would occur each year between the 2025 baseline and 2050 buildout year, and that 10 percent of existing development would be demolished over the same period to accommodate the planned growth. Year 2025 is conservatively assumed for the construction year. Modeling assumes the default number of working days estimated by CalEEMod for all phases except building construction. The building construction phase was reduced to one calendar year. Detailed assumptions and modeling datasheets are provided in Appendix D to this PEIR. Estimated annual construction emissions are 3,606 MT CO_2e as shown in Table 4.7-4, Estimated Focused GPU Greenhouse Gas Emissions.

Table 4.7-4. Estimated Focused GPU Greenhouse Gas Emissions

Emission Source	Emissions (MT CO_2e)
Annual Construction Emissions	
Total	3,606
Operation Emissions	
Area	8,466
Electricity	64,136
Natural Gas	54,948
Mobile	247,297
Waste	15,950
Water	13,436
Total Annual Construction and Operation Emissions	408,840
Total Annual Existing Emissions	398,233

Table 4.7-4. Estimated Focused GPU Greenhouse Gas Emissions

Emission Source	Emissions (MT CO_2e)
Net Increase in GHG Emissions from Focused GPU Buildout	+10,607
SCAQMD Bright-Line Threshold	3,000
Exceeds Threshold?	Yes

Source: Refer to Appendix D for model output.
Notes: MT CO_2e = metric ton carbon dioxide equivalent; SCAQMD = South Coast Air Quality Management District

Operation

During operation, buildout under the Focused GPU would result in area and indirect emissions sources from electricity and natural gas consumption, mobile sources, water and wastewater transport, and solid waste generation. GHG emissions from electricity consumed by the buildout of the Focused GPU would be generated by fuel combustion at the electricity provider. GHG emissions from water and wastewater transport would also be indirect emissions resulting from the energy required to transport water from its source, and the energy required to treat wastewater and transport it to its treated discharge point. Future development allowed under the Focused GPU would also generate mobile source emissions from motor vehicle trips.

The total estimated operational emissions from implementation of the Focused GPU were also calculated with CalEEMod using default assumptions for the proposed land use mix, with the exception of wood hearths and stoves. In accordance with SCAQMD Rule 445, it is assumed that no new wood hearths or stoves would be installed. Default natural gas stoves and hearths in assumed. Total daily VMT for buildout of the Focused GPU was provided by Kittelson & Associates, Inc. (Appendix H to the PEIR).

The various operational GHG emissions associated with the land uses proposed by the Focused GPU are shown in Table 4.7-4. Estimated GHG emissions from the existing land use mix are also provided in Table 4.7-4 to show the estimated net increase in emissions from existing conditions.

As shown in Table 4-7.4, estimated buildout of the Focused GPU would result in a net increase in GHG emissions compared to existing conditions above the SCAQMD bright line threshold of 3,000 MT CO_2e. Based on an estimated service population of 119,935 provided by Kittelson & Associates, Inc. (2025), the Focused GPU would result in per capita emissions of 3.5 MT CO_2e/service population, which would also exceed the efficiency target of 1.5 MT CO_2e/service population. The largest increase in annual GHG emissions from future development projects under the Focused GPU are from mobile emissions, which are mostly out of the City's control, and instead controlled by State and Federal laws and regulations. Future development projects under the Focused GPU that require CEQA documentation would also be compared to the SCAQMD GHG threshold, and may incorporate project features to reduce individual project emissions. Additionally, as discussed in Section 4.13, Transportation, implementation of the Focused GPU

would not result in a significant increase in VMT. As such, total Citywide growth under the Proposed Project would result in a new increase in fuel use due to growth, but would not result in a significant increase in per capita VMT. Emissions from energy sources, which include those from the use of electricity and natural gas for power generation, are the second largest contributor to GHG emissions during operations associated with the Focused GPU. Therefore, GHG emissions generated by future projects under the Focused GPU would cumulatively contribute to Statewide GHG emissions, and impacts would be potentially significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM GHG-1 is required.

Level of Significance After Mitigation: Significant and unavoidable.

Brea Core Specific Plan

Construction

Construction emissions were estimated for development under the BCSP using CalEEMod based on similar assumptions to the Focused GPU. As with the Focused GPU, the BCSP does not propose any specific construction projects, and the details of future construction under the plan are currently unknown. It was assumed that an equal amount of development would occur each year between the 2025 baseline and 2050 buildout year, and that 10 percent of existing development would be demolished over the same period to accommodate the planned growth. Detailed assumptions and modeling datasheets are provided in Appendix D to this PEIR. Estimated annual construction emissions are 594 MT CO_2e as shown in Table 4.7-4, Estimated Brea Core Specific Plan Greenhouse Gas Emissions.

Operation

Similar to the Focused GPU, buildout of the BCSP would result in area and indirect emissions sources from electricity and natural gas consumption, mobile sources, water and wastewater transport, and solid waste generation. Estimated GHG emissions from buildout of the BCSP and the existing land use mix in the BCSP are provided in Table 4.7-5, Estimated Brea Core Specific Plan Greenhouse Gas Emissions, to show the estimated net increase in emissions from existing conditions.

Table 4.7-5. Estimated Brea Core Specific Plan Greenhouse Gas Emissions

Emission Source	Emissions (MT CO_2e)
Annual Construction Emissions	
Total	594
Operation Emissions	
Area	1,352
Electricity	9,546
Natural Gas	4,840

Table 4.7-5. Estimated Brea Core Specific Plan Greenhouse Gas Emissions

Emission Source	Emissions (MT CO_2e)
Mobile	62,034
Waste	3,140
Water	1,414
Total Annual Operation Emissions	82,920
Total Annual Existing Emissions	65,333
Net Increase in GHG Emissions from BCSP	+17,587
SCAQMD Bright-Line Threshold	3,000
Exceeds Threshold?	Yes

Note: MT CO_2e = metric ton carbon dioxide equivalent; SCAQMD = South Coast Air Quality Management District

As shown in Table 4.7-5, estimated buildout of the BCSP would result in a net increase in GHG emissions compared to existing conditions above the SCAQMD bright-line threshold. Based on an estimated service population of 28,654 provided by Kittelson & Associates, Inc. (2025), the BCSP would result in per capita emissions of 2.9 MT CO_2e/service population, which would also exceed the efficiency target of 1.5 MT CO_2e/service population. Consistent with the Focused GPU, the largest increase in annual GHG emissions from future development projects is from mobile emissions, which are mostly out of the City's control. Future development projects would be subject to additional CEQA documentation, including evaluation under the SCAQMD GHG threshold, and may incorporate project features to reduce individual project emissions. Modeling for individual projects would also be able to account for site-specific attributes that reduce mobile emissions compared to similar development, such as an infill location. Additionally, as discussed in Section 4.13, total Citywide growth under the Proposed Project, including the BCSP area, would result in a new increase in fuel use due to growth, but would not result in a significant increase in per capita VMT. However, because emissions at the programmatic level exceed the SCAQMD threshold, GHG emissions generated by future projects under the BCSP would cumulatively contribute to Statewide GHG emissions, and impacts would be potentially significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM GHG-1 is required.

Level of Significance After Mitigation: Significant and unavoidable.

4.7.4.2 Threshold GHG-b: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

2022 CARB Scoping Plan

The 2022 Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other State agencies to adopt regulations and other initiatives to reduce GHGs. The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors. However, the 2022 Scoping Plan is not directly applicable to specific projects.

Development projects accommodated under the Focused GPU and BCSP are required to adhere to the programs and regulations identified by the 2022 Scoping Plan and implemented by State, regional, and local agencies to achieve the Statewide GHG reduction goals of AB 1279. Appendix D, Local Actions, of the 2022 Scoping Plan outlines priority GHG reduction strategies to be implemented through local projects. These strategies are not mandates for new development; however, these strategies represent the most applicable tool for evaluating project consistency with the 2022 Scoping Plan.

As shown in Tables 4.7-4 and 4.7-5, a majority of the GHG emissions associated with buildout of the Focused GPU and BCSP would be attributed to mobile and energy sources. These emissions would decline in the future due to Statewide measures, as well as cleaner technology, more efficient emissions standards, and retirement of older vehicles from the road. However, emissions standards are set at the Federal and State levels, and the City has little control over vehicle emissions. As such, Appendix D of the 2022 Scoping Plan prioritizes transportation electrification and VMT reduction by converting fleet vehicles to ZEV, reducing minimum parking standards, implementing complete streets policies, increasing access to public transit, and encouraging transit-oriented infill development. As discussed in Section 4.13, Transportation, implementation of the Focused GPU and BCSP would not result in a significant increase in VMT. In addition, future projects would be required to comply with CALGreen as it relates to EV parking requirements. The proposed Focused GPU's Mobility Element includes policies that enable and encourage non-motorized travel alternative forms of transportation, increasing access to public transit and other multi-modal transportation services, and developing a complete streets networks.

Regarding energy, Appendix D of the Scoping Plan also prioritizes building decarbonization through the adoption of ordinances that require all-electric new construction, implementing energy efficiency retrofits or replacements for existing buildings, deploying renewable energy production and energy storage in new public projects and on existing public facilities, and including all-electric appliances in new construction beginning in 2026 for residential and 2029 for commercial land uses. Although these actions are encouraged in the 2022 Scoping Plan, AB 130 was recently adopted and limits local jurisdictions' ability to adopt reach codes, including those that would require all-electric development. However, new buildings constructed under the Focused GPU and BCSP would continue to be required to meet the current CALGreen and Building Energy Efficiency Standards, including energy efficient design and installation of solar panels for renewable energy production. Additionally, the Proposed Project does not include any components that would preclude or interfere with future project applicant participation in programs to facilitate electrification, such as the California Electric Homes Program that provides incentives for new all-electric home construction (CEC 2025).

Several of the State's plans and policies, as described above in Section 4.7.1.1, Regulatory Setting, would contribute to a reduction in mobile and energy source emissions associated with implementation of the Proposed Project, including vehicle emissions standards and the renewable portfolio standard. As described above, the Proposed Project would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2024–2050) (RTP/SCS) also known as Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the Southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2024). The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Proposed Project would provide additional housing units and mixed use development throughout the City. Additionally, Citywide growth would increase in density primarily in the center of the City through implementation of the BCSP. The central portion of the City is highly urbanized and includes both existing and planned transit stations and multimodal options. The Proposed Project would target community-serving growth near planned or existing transit stations,

commercial retail service areas, high-quality transit areas, and active transportation corridors. In addition, as discussed in Section 4.13, Transportation, implementation of the Focused GPU and BCSP would not result in a significant increase in VMT. Therefore, the Proposed Project would not conflict with the Connect SoCal, and impacts would be less than significant

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.7.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to GHG emissions that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.7.5.1 Cumulative Threshold GHG-a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

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The geographic scope of consideration for GHG emissions is on a global scale because such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By nature, GHG evaluations are a cumulative study. The Proposed Project is inherently cumulative and considers cumulative development that could occur in the Project area over a defined time frame. As indicated under the analysis of Section 4.7.4.1, Threshold GHG-a, implementation of the Focused GPU and BCSP may result in net increase of GHG emissions above the SCAQMD threshold. Mitigation measure MM GHG-1 would reduce GHG emissions; however, emissions reductions cannot be quantified at this time. While implementation of mitigation measure MM GHG-1 would reduce the Focused GPU and BCSP's incremental contribution to the cumulative impact, the Proposed Project would have a cumulatively considerable contribution to a significant cumulative GHG impact.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM GHG-1 is required.

Level of Significance After Mitigation: Significant and unavoidable.

4.7.5.2 Cumulative Threshold GHG-b: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Focused General Plan Update and Brea Core Specific Plan

Similar to the above Cumulative Threshold GHG-a, geographic scope of consideration for GHG emissions as it pertains to consistency with an applicable plan, is also on a global scale. As described in Section 4.7.4.2, Threshold GHG-b, implementation of the Focused GPU and BCSP would not conflict with the goals, policies, and intent of CARB's 2022 Scoping Plan and SCAG's RTP/SCS. The Proposed Project would increase density near transit thereby decreasing VMT and GHG emissions from mobile sources over time. Therefore, the Focused GPU and BCSP would not have a cumulatively considerable contribution to a significant cumulative GHG impact.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.7.6 Level of Significance Before Mitigation

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Without mitigation, annual GHG emissions, including construction and operation from implementation of the Focused GPU and BCSP, would be potentially significant under Threshold GHG-a individually and cumulatively.

Environmental impacts related to GHG-b under the Focused GPU would be less than significant individually and cumulatively with compliance with PPP GHG-1 through PPP GHG-5, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the PEIR). No mitigation measures are required.

4.7.7 Mitigation Measures

MM GHG-1 **GHG Reduction Plan for Future Development.** As part of the development review process for individual development projects that are not exempt from CEQA, the Brea Community Development Department shall require a greenhouse gas (GHG) emissions technical analysis prepared by a qualified environmental professional for all projects exceeding 190 single-family dwelling units, 360 multi-family dwelling units, or 56,000 square feet of non-residential square footage.[5] If the GHG technical analysis shows that construction- or operational-related GHG emissions project will meet or exceed the South Coast Air Quality Management District Interim

[5] Consistent with SCAQMD methodology for the screening levels in Table 3-3 of the Interim CEQA GHG Significance Threshold Draft Guidance Document (SCAQMD 2008), 190 single-family residential units, 360 multi-family residential units, or 56,000 SF of retail development would generate approximately 3,000 MT CO2e annually, assuming default CalEEMod assumptions for Year 2025. See Appendix D for calculation details.

California Environmental Quality Act GHG Tier 3 Significance Threshold of 3,000 metric ton carbon dioxide equivalent (MT CO_2e) and per capita threshold of 1.5 MT CO_2e per service population, a GHG reduction plan shall be prepared to reduce GHG emissions to below the applicable threshold. The GHG reduction plan shall include potential mitigation measures from the California Air Pollution Control Officers Association Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Mitigation measures shall be selected based on the nature of the project and characteristics of the GHG emission source(s). Potential measures include, but are not limited to the following:

- Transportation and Land Use: Mobile GHG emissions can be mitigated through project site location and design, including:
  - Prioritizing infill development with high destination accessibility
  - Improving destination accessibility
  - Orient project toward transit, bicycle, or pedestrian facility
  - Locate project near bike path/bike lane
  - Provide bike parking, especially near transit
  - Provide traffic calming measures to encourage pedestrian/bicycle activity
  - Create urban non-motorized zones
  - Construct or improve bicycle and pedestrian facilities
  - Provide first and last mile services to connect project to existing transit or community services, such as a shuttle program
  - Implement preferential parking permit program for ride-share participants
  - Provide electric vehicle infrastructure beyond California Green Building Standards Code (CALGreen) requirements
  - Provide end-of-trip bicycle facilities
  - Implement a school pool program
  - Implement telecommute and/or alternative work schedule program
  - Implement commute trip reduction programs
  - Implement paid parking
  - Replace traffic controls with roundabout where appropriate
  - Incorporate park-and-ride lots
  - Designate zero emissions delivery zones
  - Electrify loading docks
  - Install hydrogen fueling infrastructure for projects that include a fleet fueling component
- Green Building Measures: Building design beyond CALGreen requirements can reduce GHG emissions from energy and water use. Some strategies include:

  - Install whole-house fans.
  - Install energy-saving lighting, heating, cooling systems, and appliances.
  - Design buildings with passive environmental controls to maximize natural heating and cooling.
  - Install electric vehicle charging stations to support clean transportation.
  - Provide on-site renewable energy generation systems and storage
  - Install electric heat pumps
  - Implement yard equipment exchange program
  - Provide electric yard equipment compatibility, such as outdoor outlets
  - Install green or cool roofs
  - Provide high efficiency outdoor lighting
  - Install cool pavement
  - Eliminate the use of natural gas
  - Use reclaimed non-potable water for landscaping
  - Use gray water
  - Require low-flow fixtures
  - Design water efficient landscaping
  - Participate in waste diversion programs

- Project Construction: GHG emissions from construction can be reduced through sustainable practices such as the following:
  - Recycle demolished construction material beyond CALGreen requirements
  - Source wood materials from urban wood reuse program
  - Use local and sustainable building materials
  - Use local construction contractors
  - Use cleaner-fuel equipment
- Natural/Working Lands: Support carbon sequestration, reduce urban heat island impact, and improve access to local food sources through practices such as the following:
  - Make public space available for establishment of a local farmers market
  - Establish areas available for community gardens
  - Expand urban tree planting
  - Create new vegetated spaces

4.7.8 Level of Significance After Mitigation

Threshold GHG-a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Focused General Plan Update

Implementation of MM GHG-1 would reduce impacts related to operational GHG emissions under the Focused GPU, but it would not reduce impacts to less than significant. However, various State measures have been adopted to specifically target and reduce emissions from both mobile and energy sources: 1) the RPS requires an increase in renewable electricity from utility providers; 2) the ACC II Regulations increases the demand for ZEVs and decreases GHG emissions; 3) the latest Title 24 Building Energy Efficiency Standards require new buildings to increase energy efficiency; 4) CARB Scoping Plan aims to reduce GHG emissions from transportation fuels through incentivizing the production and use of cleaner alternatives like biofuels and ZEVs; 5) SB 100 establishes RPS mandates for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030; 6) SB 1020, also known as the Clean Energy, Jobs, and Affordability Act of 2022, mandates that California achieve 90 percent clean electricity by 2035, 95 percent by 2040, and 100 percent by 2045, while also cutting carbon emissions by 85 percent by 2045; 7) SB 1383 aims to reduce GHG emissions by diverting organic waste from landfills, with a goal of reducing organic waste disposal by 75 percent from 2014 levels by 2025; 8) SB 350 increases California's renewable electricity procurement goal to 50 percent by 2030 and requires the State to double Statewide energy efficiency savings in electricity and natural gas end uses by 2030.

Although these existing State measures would reduce the overall GHG impacts, it cannot be guaranteed that inclusion of these measures for future projects and Statewide efforts would reduce emissions below the SCAQMD thresholds. There are no additional feasible mitigation measures beyond MM GHG-1 that would reduce GHG impacts.

Mitigating GHG emissions within the framework of a General Plan is challenging due to the unknown of specific future development. Current and future regulatory environment drives many design and project changes. Key policies such as mandatory installation of EV charging infrastructure, electrification of new residential buildings, and the continuous evolution of building and green codes, shape the path forward primarily driven from the State and Federal mandates. These regulations are important for long-term sustainability and will continue to steer the City toward compliance with State and Federal standards. As discussed in Section 4.2, Air Quality, local requirements on new residential development, such as a limit to natural gas use, would conflict with AB 130, which limits the ability of local agencies to enact more restrictive standards for residential development. Additionally, CALGreen regulations are in place to encourage electrification of the vehicle fleet by requiring supporting infrastructure. Mitigation that goes beyond these requirements, such a requirement of use of electric vehicles, would interfere in

individual consumer choice and is beyond the scope of the Proposed Project. The Proposed Project does not include any components that would interfere with participation in available incentive programs. Since there is no further feasible and enforceable mitigation available to reduce operational emissions under the Focused GPU, impacts would remain significant and unavoidable even with implementation of MM GHG-1.

Brea Core Specific Plan

Under BCSP, individual project impacts related to Thresholds GHG-a would be less than significant. However, the BCSP contributes to the total Focused GPU emission that do exceed the SCAQMD thresholds. As such, the BCSP, in combination with future projects in the Focused GPU area, would result in a cumulative considerable contribution. Cumulative GHG impacts from the BCSP would be cumulatively considerable, and incorporation of MM GHG-1 is required. However, as discussed above under the Focused GPU, even with implementation of MM GHG-1, impacts would remain significant and there are no other feasible mitigation measures to reduce impacts to less than significant level. Therefore, significant and unavoidable impacts would remain under the BCSP.

4.8 Hazards and Hazardous Materials

This section evaluates the potential for impacts on hazards and hazardous materials resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.8.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to hazards and hazardous materials.

4.8.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address hazards and hazardous materials.

Federal

Comprehensive Environmental Response, Compensation, and Liability Act (U.S. Code, Title 42, Section 9601 et seq.)

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) is a law developed to protect the water, air, and soil resources from the risks created by past chemical disposal practices. This law is also referred to as the "Superfund Act" and regulates sites on the National Priority List, which are called "Superfund sites." CERCLA provides Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Federal actions related to CERCLA are limited to sites on the National Priorities List for cleanup activities, with listings based on the U.S. Environmental Protection Agency's (USEPA's) Hazard Ranking System. The Hazard Ranking System is a numerical ranking system used to screen potential sites based on criteria such as the likelihood and nature of the hazardous material release and the potential to affect people or environmental resources. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986, as outlined below.

Superfund Amendments and Reauthorization Act

In 1986, Congress passed Superfund Amendments and Reauthorization Act (SARA). SARA is primarily intended to address the emergency management of accidental releases and to establish State and local emergency planning committees responsible for collecting hazardous material inventory, handling, and transportation data. Specifically, under Title III of SARA, a nationwide emergency planning and response program established reporting requirements for businesses that store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under Federal laws. Title III of SARA also requires each State to implement a comprehensive system to inform Federal authorities, local agencies, and the public when significant quantities of hazardous

or acutely toxic substances are stored or handled at a facility. This data is made available to the community at large under the "right-to-know" provision, with SARA also requiring annual reporting of continuous emissions and accidental releases of specified compounds.

Emergency Planning and Community Right-To-Know Act (U.S. Code, Title 42, Chapter 116)

Title III of SARA may be cited as the "Emergency Planning and Community Right-to-Know Act of 1986." This act was created to help communities plan for emergencies involving hazardous substances. The act establishes requirements for Federal, State, and local governments, Native American Tribes, and industry regarding emergency planning and reporting on hazardous and toxic chemicals. There are four major provisions of the Emergency Planning and Community Right-to-Know Act: Emergency Planning (Sections 301–303); Emergency Release Notification (Section 304); Hazardous Chemical Storage Reporting (Sections 311–312); Toxic Chemical Release Inventory (Section 313); and the Clean Air Act Risk Management Plan Regulations (Clean Air Act, Section 112[r]).

The act requires the establishment of State commissions, planning districts, and local committees to facilitate the preparation and implementation of an Emergency Plan. Under these requirements, local emergency planning committees are responsible for developing a plan that includes the following to prepare for and respond to a chemical emergency:

- An identification of local facilities and transportation routes where hazardous materials are present.
- The procedures for immediate response in case of an accident (this must include a community-wide evacuation plan).
- A plan for notifying the community that an incident has occurred.
- The names of response coordinators at local facilities.
- A plan for conducting drills to test the plan. The Emergency Plan is reviewed by the State Emergency Response Commission and publicized throughout the community. The local emergency planning committee is required to review, test, and update the plan each year.

Another purpose of the Emergency Planning and Community Right-to-Know Act is to inform communities and residents of chemical hazards in their areas. Sections 311 and 312 require businesses to report to State and local agencies the location and quantities of chemicals stored on site. Under Section 313, manufacturers are required to report chemical releases for more than 600 designated chemicals. In addition to chemical releases, regulated facilities are also required to report off-site transfers of waste for treatment or disposal at separate facilities, pollution prevention measures, and chemical recycling activities. The U.S. Environmental Protection Agency maintains the Toxic Release Inventory database that documents the information that regulated facilities are required to report annually.

Resource Conservation and Recovery Act (U.S. Code, Title 42, Section 6901 et seq.)

The Resource Conservation and Recovery Act is the principal Federal law that regulates generation, management, and transportation of hazardous waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. Federal hazardous waste laws are largely promulgated under the Resource Conservation and Recovery Act (RCRA) (40 CFR, Part 260), as amended by the Hazardous and Solid Waste Amendments of 1984 (which are primarily intended to prevent releases from leaking underground storage tanks). These laws provide for the "cradle to grave" regulation of hazardous wastes. Specifically, under RCRA, any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. The U.S. Environmental Protection Agency (USEPA) has the primary responsibility for implementing the RCRA, although individual States can obtain authorization to implement some or all RCRA provisions.

Hazardous Materials Transportation Act

The U.S. Department of Transportation regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations, which requires the U.S. Department of Transportation Office of Hazardous Materials Safety to generate regulations for the safe transportation of hazardous materials.

Clean Water Act/Spill Prevention, Control, and Countermeasure Rule

The Clean Water Act (CWA) (33 USC Section 1251 et seq., formerly the Federal Water Pollution Control Act of 1972) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. As part of the CWA, USEPA oversees and enforces the Oil Pollution Prevention regulation contained in 40 CFR Part 112, which is often referred to as the "SPCC Rule" because it requires facilities to prepare, amend, and implement spill prevention, control, and countermeasure (SPCC) plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, the total aboveground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons and, because of its location, the facility could reasonably be expected to discharge oil into or upon the "navigable waters" of the U.S.

Other Federal regulations overseen by USEPA relevant to hazardous materials and environmental contamination include 40 CFR Part 1(D) (Water Projects) and 40 CFR Part 1(I) (Solid Wastes). Further, 40 CFR Part 1(D)(116) sets forth a determination of the reportable quantity for each substance that has been designated as hazardous, and 40 CFR Part 1(D)(117) applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the U.S.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration's (OSHA's) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. The OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation projects. OSHA standards are listed in 29 CFR Part 1910.

State

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State Hazardous Waste Management Project, which is similar to but more stringent than the Federal RCRA Project. The act is implemented by regulations contained in Title 26 of the California Code of Regulations (CCR), which describe the following aspects of the requirements for the proper management of hazardous waste:

- Identification and classification;
- Generation and transportation;
- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from the generator to the transporter to the ultimate disposal location. Copies of the manifest must be filed with the Department of Toxic Substances Control (DTSC).

Certified Unified Program Agency

Pursuant to California Health and Safety Code, Chapter 6.11, the California Environmental Protection Agency (CalEPA) established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated a number of existing State programs related to hazards and hazardous materials. The Unified Program allows the designation of Certified Unified Program Agencies (CUPAs) to implement associated State regulations within their jurisdiction. CUPAs maintain records regarding location and status of sites that use hazardous materials within their areas of jurisdiction and administer programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have

contractual agreements with another local agency (i.e., a participating agency) that implements one or more Program Elements in coordination with the CUPA.

2018 State of California Multi-Hazard Mitigation Plan

The State of California Multi-Hazard Mitigation Plan is the official statement of the State's hazard identification, vulnerability analysis, and hazard mitigation strategy. The goal of the State of California Multi-Hazard Mitigation Plan is to guide implementation activities to achieve the greatest reduction of vulnerability, which results in saved lives, reduced injuries, reduced property damages, and protection for the environment. In particular, the State of California Multi-Hazard Mitigation Plan helps administer the Local Hazard Mitigation Plan (LHMP) program for the State. The California Emergency Management Agency supports and assists local governments in the development of LHMPs and tracks the progress and effectiveness of plan updates and projects. It provides local governments with information on integrating hazard identification, risk assessment, risk management, and loss prevention into a comprehensive approach to hazard mitigation and helps them identify cost-effective mitigation measures and projects.

California Environmental Protection Agency

CalEPA was created in 1991. It unified California's environmental authority into a single cabinet-level agency and brought the California Air Resources Board, State Water Resources Control Board (SWRCB), Regional Water Quality Control Boards (RWQCBs), California Department of Resources, Recycling and Recovery, DTSC, the Office of Environmental Health Hazard Assessment, and the Department of Pesticide Regulation under one agency. These agencies were placed within the CalEPA "umbrella" for the protection of human health and the environment to ensure a coordinated deployment of State resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by SWRCB as having UST leaks or discharges of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material. For site remediation, DTSC does not publish, nor use, generic soil cleanup levels for contaminated sites. Because each site is unique, cleanup levels

must be calculated for each site through a risk assessment, which takes into account the types of toxic materials at each site, the potential receptors, the pathways that the toxic compounds might follow to get to the receptors and their fate in the environment. The process begins with a Preliminary Endangerment Assessment, which may be followed by a health risk assessment, depending on the findings of the Preliminary Endangerment Assessment.

State Water Resources Control Board

SWRCB is responsible for Statewide regulation of water resources. SWRCB's mission is to "ensure the highest reasonable quality for waters of the State of California while allocating those waters to achieve the optimum balance of beneficial uses." SWRCB thus has joint authority over water allocation and water quality protection. SWRCB supports the efforts of the individual RWQCBs, of which there are nine Statewide. Each RWQCB makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements (WDRs), determining compliance with those requirements, and taking appropriate enforcement actions. Water quality standards are defined in each RWQCB's respective Basin Plan. A Basin Plan must conform to the policies set forth in the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and established by SWRCB in its State water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The RWQCBs are also authorized to enforce discharge limitations, take actions to prevent violations of these limitations from occurring, and conduct investigations to determine the status of quality of any of the waters of the State of California within their region. Civil and criminal penalties are also applicable to people who violate the requirements of the Porter-Cologne Act or SWRCB/RWQCB orders.

California Porter-Cologne Water Quality Control Act

The Federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the individual States, although it does establish certain guidelines for the States to follow in developing their programs. California's primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require the cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Office of Emergency Services

To protect public health and safety as well as the environment, the California Office of Emergency Services is responsible for establishing and managing Statewide standards for business and area plans related to the handling and release, or threatened release, of hazardous materials. The California Office of Emergency Services requires basic information regarding hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and health risks) to be available to firefighters, public safety officers, and regulatory agencies. Typically, this information should be included in business plans to prevent or mitigate impacts on the environment or the health and safety of individuals from the release or threatened release of these materials into the workplace and environment. These regulations are covered under Chapter 6.95 of the California Health and Safety Code, Article 1, Hazardous Materials Release Response and Inventory Project (Sections 25500 to 25520), and Article 2, Hazardous Materials Management (Sections 25531 to 25543.3).

Title 19 of the CCR (Public Safety; Division 2; Office of Emergency Services; Chapter 4; Hazardous Material Release Reporting, Inventory, and Response Plans; Article 4 [Minimum Standards for Business Plans]) establishes minimum Statewide standards for Hazardous Materials Business Plans. These plans must include the following: a hazardous material inventory, in accordance with Sections 2729.2 to 2729.7; emergency response plans and procedures, in accordance with Section 2731; and training project information, in accordance with Section 2732. Business plans should contain basic information regarding the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the State. Each business will prepare a hazardous materials business plan if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance;
- 55 gallons of a liquid;
- 200 cubic feet of compressed gas;
- A hazardous compressed gas in any amount; and
- Hazardous waste in any quantity.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency with responsibility for worker safety with respect to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than Federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337–340). The regulations specify requirements regarding employee training, the availability of safety equipment, accident-prevention projects, and hazardous substance exposure warnings.

Asbestos-Containing Materials Regulations

State-level agencies, in conjunction with USEPA and the Cal/OSHA, regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk of asbestos emissions and exposure. Federal, State, and local agencies must also be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls

USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (15 USC Section 2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and highly specific safety procedures for their disposal. California also regulates electrical equipment with PCBs and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed of accordingly. At lower concentrations for non-liquids, RWQCBs may exercise discretion over the classification of such wastes.

Lead-Based Paint

Cal/OSHA's Lead in Construction Standard is contained in 8 CCR Section 1532.1. The regulations address all of the following areas: permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Hazardous Materials Transportation

The California Highway Patrol and California Department of Transportation are the State agencies with primary responsibility for enforcing Federal and State regulations and responding to hazardous materials transportation emergencies. These agencies also govern permitting for hazardous materials transportation within the State.

California Fire Code (California Code of Regulations, Title 24, Part 9)

The California Fire Code sets forth requirements for building materials and methods pertaining to fire safety and life safety, fire protection systems in buildings, emergency access to buildings, and

handling and storage of hazardous materials. The City of Brea adopts the update to the California Fire Code every 3 years.

Government Code, Section 65302, requires the Safety Element of a General Plan to address evacuation routes. The CAL FIRE Safety Element checklist also requires cities to address evacuation routes. In addition, Senate Bill 99 (2018) requires a Safety Element upon the next revision of the housing element on or after January 1, 2020, to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes.

Hazardous Materials Business Plans

Both the Federal government (Code of Federal Regulations) and the State of California (California Health and Safety Code) require businesses that handle more than a specified amount, or "reporting quantity," of hazardous or extremely hazardous materials to submit a Hazardous Materials Business Plan to the Orange County Health Care Agency (OCHCA), Environmental Health Division, which is the local CUPA.

Hazardous Materials Business Plans must include an inventory of the hazardous materials at the facility. Businesses must update their plan and the chemical portion annually. In addition, Hazardous Materials Business Plan must include emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. These plans need to identify the procedures for immediate notification of the appropriate agencies and personnel, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for the company emergency coordinators, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel.

Hazardous Materials Disclosure Programs

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans), the California Accidental Release Prevention Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by CUPAs.

The CUPA for the City is the OCHCA Environmental Health Division, which is responsible for regulating hazardous waste and tiered permitting, underground storage tanks, aboveground storage tanks, and Risk Management Plans. The OCHCA Environmental Health Division administers the Hazardous Materials Business Plans. The Brea Fire Department is a participating agency under the Unified Program and administers permits for handling underground storage and storage of hazardous materials pursuant to the Brea Fire Code.

Hazardous Materials Release Notification

The following State statutes require emergency notification of a hazardous chemical release:

- California Health and Safety Code, Sections 25270.8 and 25507
- California Vehicle Code, Section 23112.5
- California Public Utilities Code, Section 7673, (California Public Utilities Commission General Orders No. 22-B and 161)
- California Government Code, Sections 51018 and 8670.25.5(a)
- California Water Code, Sections 13271 and 13272
- California Labor Code, Section 6409.1(b)10

Requirements for immediate notification of significant spills or threatened releases cover owners, operators, people in charge, and employers. Notification is required regarding significant releases from facilities, vehicles, vessels, pipelines, and railroads. In addition, releases that result in injuries or harmful exposure to workers must be immediately reported to the California Division of Occupational Safety and Health (Cal/OSHA) pursuant to the California Labor Code, Section 6409.1(b).

Leaking Underground Storage Tanks

Releases of petroleum and other products from USTs have been recognized since the early 1980s as the primary cause of groundwater contamination in the United States. The RCRA Subtitle I establishes regulations governing the storage of petroleum products and hazardous substances in USTs and the prevention and cleanup of leaks. In USEPA Region 9 (California, Arizona, Hawaii, Nevada, Pacific Islands, and over 140 Tribal nations) the UST program operates primarily through State agency programs with USEPA oversight. Under the umbrella of CalEPA, the SWRCB provides assistance to local agencies enforcing UST requirements. The purpose of the UST program is to protect public health and safety and the environment from releases of petroleum and other hazardous substances. The program consists of four elements: leak prevention, cleanup, enforcement, and tank tester licensing. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs, including groundwater analytical data, the surveyed locations of monitoring wells, and other data. The SWRCB's GeoTracker system currently has information submitted by responsible parties for over 10,000 leaking UST (LUST) sites Statewide and was extended to include all SWRCB groundwater cleanup programs, including the LUST, non-LUST (Spill, Leaks, Investigation, and Cleanup), Department of Defense, and landfill programs.

CCR, Title 23, Chapter 16 (Underground Storage Tank Regulations) establish requirements for the design, construction, monitoring, repair, upgrade, and closure of USTs. The regulations also provide for the proper release reporting, initial abatement, and corrective action requirements.

Local

Responsible regional and local agencies that regulate hazardous materials and waste in accordance with Federal and State laws include the OCHCA Environmental Health Division and Brea Fire Department.

The Environmental Health Division was designated as the Certified Union Program Agency (CUPA) for the County of Orange in 1997 by the California Secretary for Environmental Protection. CUPA serves as an administrative agency that coordinates regulation of hazardous materials and waste in Orange County. The CUPA oversees the following six agencies: Hazardous Materials Disclosure, Business Emergency Plan, Hazardous Waste, Underground Storage Tank, Aboveground Petroleum Storage Tank, and California Accidental Release Prevention. These agencies have developed specific plans for identifying and managing different types of hazardous waste, described in more detail below.

Hazardous Materials Disclosure and Business Emergency Plan: The Hazardous Materials Disclosure and Business Emergency Plan (HMBEP) program requires businesses that handle hazardous materials such as hazardous waste or substances at reportable quantities to submit an HMBEP to the California Environmental Reporting System. The CUPA then verifies this information and provides it to agencies that are responsible for the protection of public health and the environment.

Hazardous Waste: The Hazardous Waste Inspection Program is overseen by the Environmental Health Division throughout Orange County. This program aims to manage the proper handling, recycling, treatment, storage, and disposal of all hazardous wastes generated by Orange County businesses. Through this program, specialists inspect facilities that generate hazardous waste, evaluate industries that generate hazardous waste, investigate reports of illegal hazardous waste disposal, and respond to emergency spills of hazardous chemicals. Additionally, specialists engage in public education programs that inform industries and residents about regulations relating to proper hazardous waste disposal.

Underground Storage Tank: The UST Inspection Program serves to ensure that hazardous materials stored in underground tanks are not released into the environment, causing potential pollution of ground or surface waters. The UST inspection program is overseen by the OCHCA Environmental Health Division in most cities of Orange County, except Anaheim and Orange. Environmental Health is responsible for implementing and enforcing UST codes. Specialists from Environmental Health inspect and monitor equipment and compliance of UST systems to ensure that they comply with relevant laws and regulations. The Environmental Health Division also aims to educate and help tank owners and operators navigate regulatory requirements.

Aboveground Petroleum Storage Tank: The Aboveground Petroleum Storage Act (APSA) defines "petroleum" as crude oil, or any fraction thereof, which is liquid at 60 degrees Fahrenheit

temperature and 14.7 pounds per square inch absolute pressure. Liquefied petroleum gas or propane, liquefied natural gas, hot mix asphalt, and asphalt cement do not meet the definition of petroleum under APSA. APSA does not regulate non-petroleum products. APSA regulates tank facilities that are subject to the Federal SPCC rule or tank facilities with an aggregate storage capacity of 1,320 gallons or more of petroleum in aboveground storage containers or tanks with a shell capacity equal to or greater than 55 gallons. APSA also regulates tank facilities with less than 1,320 gallons of petroleum if they have one or more stationary tanks in an underground area with a shell capacity of 55 gallons or more of petroleum, and, in this case, only the tanks in an underground area are subject to APSA, although there are exceptions. Tank facilities with 10,000 gallons or more of total aboveground petroleum storage capacity are inspected at least once every three years by a CUPA and have reporting and fee requirements, while tank facilities with an aboveground petroleum storage capacity of less than 10,000 gallons have reporting and fee requirements. With the exception to conditionally-exempt tank facilities, all tank facilities must prepare and implement an SPCC Plan that meets current Federal SPCC rule requirements. External Link. Conditionally-exempt tank facilities are not required to prepare an SPCC Plan under APSA if they meet certain conditions, but conditionally-exempt tank facilities still have reporting and fee requirements. The OCHCA Environmental Health Division is the CUPA responsible for inspections of these storage facilities in Orange County.

California Accidental Release Program (CalARP): CalARP is administered in the City by the OCHCA Environmental Health Division. OCHCA Environmental Health Division monitors and regulates identified industries in the City that have a stationary source of hazardous materials. The potential hazardous threat of CalARP facilities is determined by completing a land use compatibility analysis. The regulatory responsibilities of CalARP, including the development and implementation of a Risk Management Plan, are found in Title 19, Division2, Chapter 4.5 of the CCRs.

The primary mission of the Brea Fire Department is the delivery of life-safety services. The department provides 24-hour emergency response to a wide variety of critical situations, including fires and hazardous materials incidents. In addition, the department operates a very active Fire Prevention and Emergency Preparedness Program, with fire inspections, hazardous process permitting, fire code enforcement, public education, and business emergency planning in accordance with the CCR (City of Brea 2025).

South Coast Air Quality Management District Rule 1403

South Coast Air Quality Management District (SCAQMD) Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) provides requirements for limiting asbestos emissions from building demolition and renovation activities. Prior to site demolition activities, building materials must be carefully assessed for the presence of asbestos-containing materials (ACM), and removal of this material, where necessary, must comply with State and Federal regulations, including SCAQMD Rule 1403, which specifies work practices with the goal of minimizing asbestos

emissions during building demolition and renovation activities, including the removal and associated disturbance of ACMs. The requirements for demolition and renovation activities include asbestos surveying; notification; ACM removal procedures and time schedules; ACM handling and cleanup procedures; and storage, disposal, and landfill disposal requirements for asbestos-containing waste materials.

Siting of Schools on or near Sources of Hazardous Materials

The California Education Code (Sections 17210 et seq.) requires that, when acquiring property for a new school site, an environmental site investigation be completed to determine the health and safety risks (if any) associated with the site. The Education Code identifies DTSC's role in the assessment, investigation, and cleanup of proposed school sites. All proposed school sites that receive State funding for acquisition and/or construction must go through a comprehensive investigation and cleanup process under DTSC oversight.

2003 Brea General Plan

The 2003 Brea General Plan, Chapter 6, Public Safety, includes goals and policies aimed at ensuring public safety and protecting the community from hazards associated with hazardous materials, wildland fires, flooding, and seismic activity and geologic conditions. Existing policies related to hazards and hazardous materials include the following:

- **Goal PS-1:** Provide the highest quality public safety services to the Brea community.
  - **Policy PS-1.9:** Maintain and update, as appropriate, the City's emergency preparedness programs, plans, and procedures to ensure the health and safety of the community in the event of a major disaster.
  - **Policy PS-1.13:** Use Federal, State, and regional resources, as they become available, to address localized exposure to elevated air pollutant levels, including in disadvantaged communities in west Brea.
  - **Policy PS-1.14:** Maintain and periodically update Emergency Management Plans, including the Emergency Operations Plan, which includes training for City staff and volunteers on disaster recovery efforts such as debris removal and evaluating post-disaster re-development options. Each Brea Firefighter must complete 192 hours of annual training based upon ISO and OSHA requirements.
- **Goal PS-4:** Protect the community from the hazards associated with the transportation, use, and storage of hazardous materials in the urban environment.
  - **Policy PS-4.1:** Ensure that hazardous materials used in business and industry are handled properly.
  - **Policy PS-4.2:** Reduce the risks associated with ground transportation hazards.

  - **Policy PS-4.3:** Work with responsible Federal, State, and County agencies to identify and regulate the disposal of toxic materials.
  - **Policy PS-4.4:** Provide education and information to City residents regarding the proper use and disposal of household hazardous materials.

- **Goal PS-5:** Minimize the public's exposure to potential hazards associated with existing and abandoned oil facilities.
  - **Policy PS-5.1:** Work closely with responsible State and Federal agencies to ensure that active oil field operations comply with all current regulations and, once oil field operations cease, that appropriate closure and clean-up activities occur.
  - **Policy PS-5.2:** Continue to support the regulations of the California Division of Oil, Gas, and Geothermal Resources regarding abandoned oil facilities.
  - **Policy PS-5.3:** Require comprehensive investigation, disclosures, and remediation of any former oil field property proposed for an alternative use.

Brea City Code

Brea City Code (BCC) Title 8, Health, Safety, and Welfare, includes the following chapters:

- **Chapter 8, Emergency Preparedness:** The purposes of this chapter are to provide for the preparation and implementation of plans for the protection of people and property within the city in the event of an emergency; the direction of the emergency organization; and the coordination of the emergency functions of the city with all other public agencies, corporations, organizations and affected private people.
- **Chapter 8.24, Oil and Oil Wells:** Provides minimum health and safety standards for oil and gas exploration, drilling and production sites.
- **Chapter 8.28, Solid Waste Collection:** This chapter provides regulations designed to eliminate or alleviate issues associated with storage, accumulation, collection and disposal of refuse, trash, rubbish, solid waste, debris and other discarded material, as well as recyclable material. Solid waste is a matter of great public concern, in that improper control of such matters creates a public nuisance, which may lead to air pollution, fire hazards, illegal dumping, vector breeding and infestation and other problems affecting the health, welfare and safety of the residents of the city and adjacent communities.
- **Chapter 8.42, Pipeline Franchises:** Establishes rules, regulations, restrictions and terms and conditions associated with the granting of a franchise for pipelines used for the collection, transportation or distribution of oil, gas, gasoline, petroleum, wet gas, hydrocarbon substances, water, waste water, mud, steam, and other liquid and gaseous substances which are not more hazardous than the aforementioned substances.

BCC Title 20, Zoning Code, includes Chapter 20.48, Off-Site Hazardous Waste Facilities, establishes uniform standards, land use regulations, and a permit process for controlling the location, design, maintenance, and safety of off-site hazardous waste facilities.

BCC Title 16, Fire Safety, includes Chapter 16.04, Brea Fire Code, which adopts the 2025 Edition of the California Fire Code with amendments, additions, deletions, and exceptions. Amendments to the California Fire Code in this chapter applicable to the Proposed Project include:

- **Section 102.10:** A construction permit is required for the installation or modification of a methane mitigation system. Maintenance performed in accordance with the current City of Brea Combustible Soil-Gas Guideline is not considered to be a modification and does not require a construction permit.
- **Section 326.1:** All projects with sources of methane soil gas are subject to methane soil gas testing, passive or active mitigation, and methane detection and alarm systems. Projects shall be required to conform to the current adopted Brea Fire Department Combustible Soil-Gas Guideline.
- **Section 326.2:** Additions or modifications to a lot or existing building in any identified methane area that expands the original footprint, shall be required to add methane mitigation requirements per the current adopted Brea Fire Department Combustible Soil-Gas Guideline.

City of Brea Local Hazard Mitigation Plan

The City of Brea LHMP allows public safety officials and City staff, elected officials, and members of the public to understand threats from natural and human-caused hazards. The plan recommends specific actions or strategies to decrease exposure or risk from these threats, reducing instances of property damage, injury, and loss of life from disasters. An LHMP is a way for the City to better prepare in advance of these disasters, so when they do occur, less damage occurs, and recovery is easier. Besides protecting public health and safety, this approach can save money. Studies estimate that every dollar spent on mitigation saves an average of four dollars on response and recovery costs. The LHMP also makes the City eligible for grants from the Federal Emergency Management Agency (FEMA) that can be used to further improve safety and preparedness in the community. Having an adopted LHMP can also make the City eligible to receive more financial assistance from the State when disasters do occur (City of Brea 2024).

The City of Brea LHMP includes four main sections:

1. A summary of the natural and human-caused hazards that pose a risk to the community. This includes descriptions of past disaster events and the chances of these disasters occurring in the future.
2. An assessment of the threat to the city that describes how the community is vulnerable to future disasters. The plan assesses the threat to important buildings and

infrastructure, such as police and fire stations, hospitals, roads, and utility lines. It also evaluates the threat to community members, particularly vulnerable populations.

3. A hazard mitigation strategy, which establishes policy recommendations for the City to carry out over the next five years. These recommendations help reduce the threat that the community faces from hazard events.
4. A section on maintaining the plan, which helps ensure that the LHMP is kept up to date. This also helps with implementation of the LHMP and keeps the City eligible for additional funding.

The City of Brea LHMP has the following goals:

- **GOAL-1:** Protect against threats from natural hazards to life, injury, and property damage within the Brea Community.
- **GOAL-2:** Increase public awareness of potential hazard events.
- **GOAL-3:** Preserve critical services and functions by protecting key facilities and infrastructure for the community.
- **GOAL-4:** Protect natural systems from current and future conditions.
- **GOAL-5:** Coordinate mitigation activities among City departments, neighboring jurisdictions, and with State and Federal agencies.
- **GOAL-6:** Prepare for long-term changes in hazard conditions.

City of Brea Emergency Preparedness Program

Brea is well prepared to respond to all types of emergencies. The City's Emergency Preparedness Program addresses appropriate responses to major earthquakes, hazardous materials accidents, wildfire, and dam failure. The Program describes how emergency response will be coordinated and how evacuation of residents will proceed. Program objectives include injury reduction and avoiding loss of life and property damage through effective management of emergency forces. The City of Brea's Emergency Preparedness Program is coordinated by a professional emergency manager, and includes the following five key elements:

- Development and maintenance of the City's Emergency Response Plan.
- Development and maintenance of the City's Emergency Operations Center.
- Coordination of preparedness, training, and exercises for City staff to be sure they are ready to respond to any emergency.
- Public education and outreach to the residents and businesses of Brea.
- Fund recovery following disasters.

City of Brea Combustible Soil-Gas Ordinance

The City of Brea Combustible Soil-Gas Ordinance establishes requirements for soil-gas investigations, mitigation and monitoring measures for combustible soil-gas, and maintenance and

long-term funding for soil-gas mitigation systems. The Ordinance requires a soil-gas investigation in areas where known oil facilities are or were present, prior to new development being built. If elevated concentrations of combustible soil-gas are present, or if operating oil facilities are nearby, the Ordinance requires implementation of established mitigation measures. The Ordinance applies to new construction, including additions and remodels of existing structures, for all occupied structures within the City of Brea that may experience soil-gas vapor intrusion.

Given the potential for combustible gases to accumulate in or under buildings or structures, all property that lies wholly or partially within a combustible soil-gas Impact Area (i.e., property within 300 feet of a petroleum reservoir's boundary) is required to have a comprehensive soil-gas investigation. In addition, all new developments within the Brea Fire Department's jurisdiction that are wholly or partially within a combustible soil-gas Impact Area require at least the minimum criteria for combustible soil-gas mitigation, regardless of soil-gas concentrations, and are subject to the following requirements:

- All combustible soil-gas mitigation systems shall be designed and installed in conformance with the most current version of City of Brea's Combustible Soil-Gas Ordinance and mitigation requirements.
- Under special circumstances, the City's Fire Chief may require more, or less, stringent mitigation measures as deemed appropriate for protecting public safety.
- All combustible soil-gas mitigation systems shall be designed and installed in accordance with plans submitted, reviewed, and approved by the Brea Fire Department.
- At its discretion, the City may request a third-party review of combustible soil-gas mitigation designs/plans submitted to the City.
- All Combustible soil-gas mitigation systems installed by others shall be subject to inspection by City inspectors, moreover, systems shall be subject to the approval of City inspectors.
- At its discretion, the City may use qualified third-party inspectors to monitor the installation and/or testing of combustible soil-gas mitigation systems.
- The Brea Fire Department must receive at least forty-eight (48) hours notice prior to any of the following activities:
  - Completion of below-grade mitigation elements, and prior to covering said systems.
  - Installation and/or application of membrane barrier materials.
  - Testing of membrane barrier materials
  - Completion of passive vent systems inside buildings, and prior to covering said systems.

4.8.1.2 Existing Conditions

Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or implementing agency has a reasonable basis for believing would be injurious to public health and safety or harmful to the environment if released into the workplace or the environment. CCR Title 22, Chapter 11, Article 2, Section 66261.10 defines hazardous waste as hazardous substances that no longer have practical use, such as materials that have been discarded, discharged, spilled, or contaminated or are being stored until they can be disposed of properly. Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific CCR Title 22 criteria. The BCC defines hazardous waste as a waste, or combination of wastes, which because of its quantity, concentration, toxicity, corrosiveness, mutagenicity, or inflammability, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. Past industrial or commercial activities on a site could have resulted in spills or leaks of hazardous materials to the ground, resulting in soil and groundwater contamination. There are a variety of commercial, industrial, and oil production uses within the City of Brea that involve the transport, use, storage, and disposal of potentially hazardous materials that could adversely affect soil and groundwater. For example, there are many industrial businesses and oil production and processing companies permitted to store, transport, and handle hazardous materials in Brea. Poor management or misuse of toxic chemicals (e.g., pesticides, herbicides, fertilizers) or dangerous substances (e.g., petroleum, natural gas, and radio-active, flammable or explosive materials) can lead to significant release or spill of hazardous materials, potentially resulting in evacuations, injuries, and fatalities. Additionally, while the Olinda Alpha Landfill does not accept hazardous waste, waste at this land disposal site may be a source of soil or groundwater contamination.

Hazardous materials may also be present in building materials of older structures and be released during building demolition activities. Throughout the City, current and former uses involving hazardous materials result in the potential for past and ongoing site contamination. For example, hazardous materials may be found in building materials, such as ACM or lead-based paints (LBP), or may have been used routinely for the operation of certain land uses, such as auto repair shops, gas stations, oil and mining facilities, commercial agricultural fields, medical offices, dry cleaners, and photo processing centers. Some properties in the City have experienced substantial historical releases of hazardous materials, resulting in potentially contaminated soils and groundwater on site and in the vicinity. Potentially hazardous materials commonly found in urban areas include cleaning and metal solvents, pesticides/herbicides, paints, oils, and lubricants. If improperly handled, hazardous materials and wastes can cause public health hazards when released to the soil, groundwater, or air. The four basic exposure pathways through which an individual can be exposed to a chemical agent include inhalation, ingestion, bodily contact, and injection. Exposure can come

as a result of an accidental release during transportation, storage, or handling of hazardous materials. Disturbance of subsurface soil during construction can also lead to exposure of workers or the public from stockpiling, handling, or transportation of soils contaminated by hazardous materials or waste from previous spills or leaks.

Hazardous Waste Generators

Businesses that typically handle and generate small quantities of hazardous waste include dry cleaners, auto repair shops, medical facilities, and photo processing centers. Larger businesses, primarily in industrial locations, can generate large quantities of hazardous waste. The USEPA regulates hazardous waste generators under the RCRA, classifying them into three categories based on the amount of hazardous waste generated per calendar month. Large-quantity generators produce 1,000 kilograms or more per month, or more than one kilogram per month of acutely hazardous waste. Small-quantity generators produce between 100 and 1,000 kilograms of hazardous waste per month. Very small-quantity generators produce less than 100 kilograms of hazardous waste per month. According to the RCRAInfo Search, Brea has 467 active very small-quantity hazardous waste generators, 150 active small-quantity hazardous waste generators and 28 active large-quantity generators (USEPA 2025).

Oil and Gas

Brea has three oil fields: Yorba Linda, East Coyote, and Brea-Olinda Oil Fields. The Yorba Linda Oil Field has been plugged and abandoned, while the East Coyote and Brea-Olinda Oil Fields are in active production. In addition to oil, the East Coyote and Brea-Olinda Oil Fields also produce natural gas. Many of the oil wells have been closed and abandoned after many years of operation. Wells that are no longer in active production must be abandoned to the satisfaction of the California Department of Conservation, Geologic Energy Management Division (CalGEM) (formerly the Division of Oil, Gas, and Geothermal Resources, or DOGGR). The abandonment process begins with the removal of surface equipment and the capping of the well. The upper 50 feet of the well is sealed with a final concrete plug and a metal plate is welded over the well annulus. CalGEM inspects the abandonment throughout each step of the process. CalGEM also identifies urban oil fields with a potential for hazardous gas accumulations that could result in explosions; the Brea-Olinda Oil Field is one of these sites. Figure 4.8-1, Oil and Gas Wells, shows oil and gas wells located in Brea.

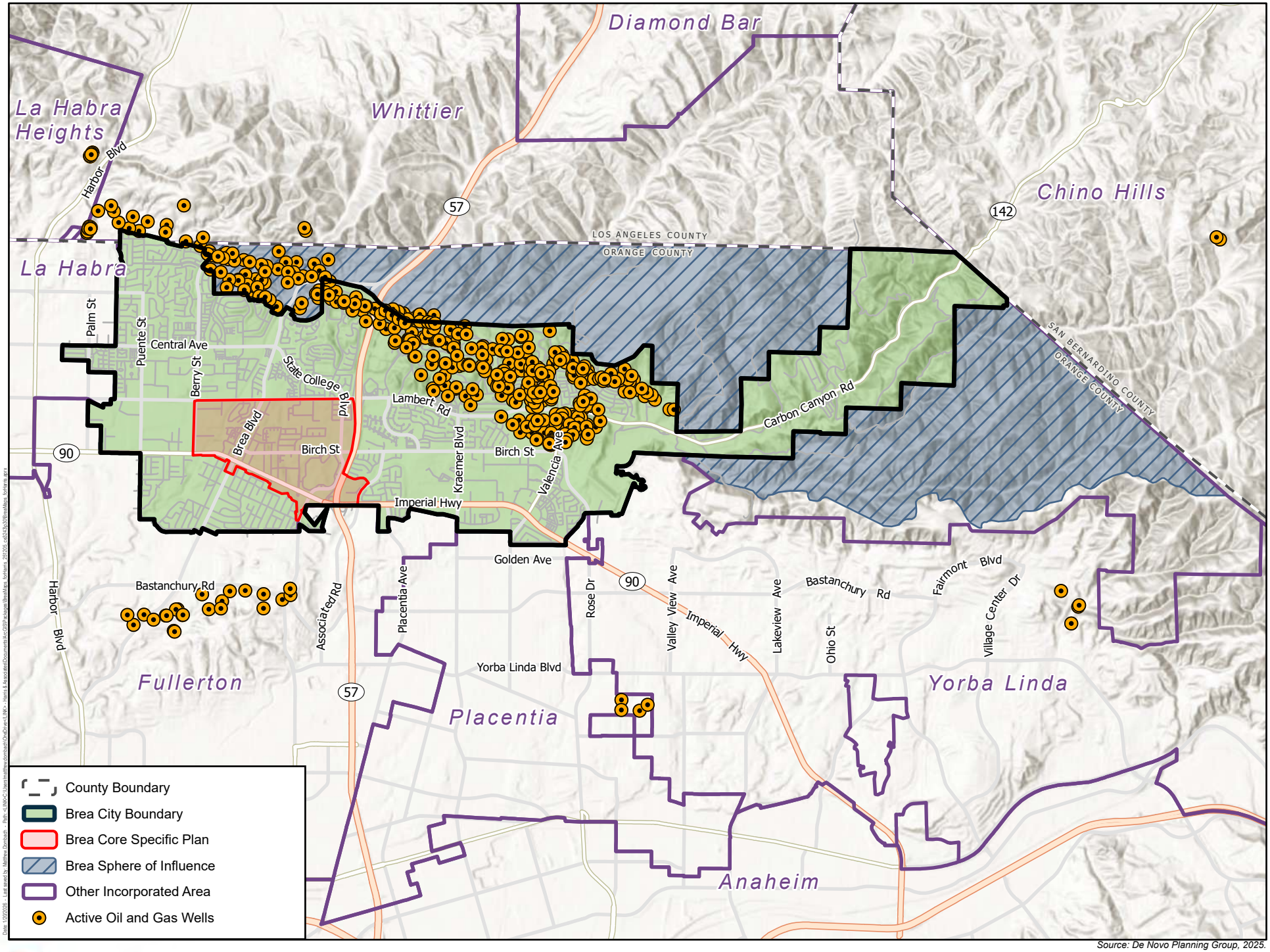
Crude oil is classified as a hazardous material because it is flammable and can burn. It can also produce flammable vapors that can flow with the wind and become ignited if they come in contact with an ignition source; the produced gas is mostly methane, which is the primary constituent of natural gas. Methane occurs as natural gas in oil and gas fields as a byproduct of petroleum production.

Methane is lighter than air, colorless, odorless, noncarcinogenic, and flammable. When methane is mixed with other gases like carbon dioxide or hydrocarbons, the methane gas mixtures typically have densities comparable to or less than air. Since methane is lighter than air, it tends to rise from depth to the ground surface, where it dissipates into the atmosphere. However, if a relatively impermeable barrier (e.g., a concrete slab) is present at the ground surface, methane can accumulate beneath that barrier.

Methane becomes potentially explosive only when it is mixed with air at concentrations between 5 percent (Lower Explosive Limit) and 15 percent (Upper Explosive Limit) (OSHA 2016). Highly explosive concentrations of methane are most commonly associated with oil and gas seepage zones. Concentrations in excess of 5,000 parts per million by volume, about 10 percent of the Lower Explosive Limit, are typically considered as an action level at which mitigation measures are recommended. Where methane exceeds 5,000 parts per million by volume, it can be conservatively assumed that it may infiltrate through flooring materials or cracks, accumulate under footings and in enclosed spaces (e.g., small rooms, vaults, wall spaces), and cause a fire or explosion hazard if an ignition source is present (e.g., pilot flame, electrical spark, cigarette) (DTSC 2005). Methane is also an asphyxiant. Figure 4.8-2, Methane Zone, identifies areas of known methane zones in Brea. These zones generally extend from northwest to southeast, including portions of the sphere of influence to the northwest and incorporated areas near the City's northern boundary. The BCSP is not located within a methane zone.

In addition, boiling liquid vapor gas cloud explosions are associated with natural gas plants and power generation turbines. A boiling liquid vapor gas cloud explosion can occur in a pressure vessel when there is significant external fire, failure of the pressure relief valves, vessel blockage, and no external firefighting efforts occurring simultaneously. At a distance of 1,237 feet from the blast overpressure zone, windows will break, and at a distance of 374 feet, eardrums can rupture and homes will be damaged.

The Brea Fire Department has jurisdiction over the investigation, remediation, and mitigation of hazardous soil gas contamination in the City. The City's Combustible Soil-Gas Ordinance sets forth policy for the scientific investigation, monitoring, mitigation, and funding for combustible soil-gas systems that include potentially hazardous concentrations of combustible soil gases.

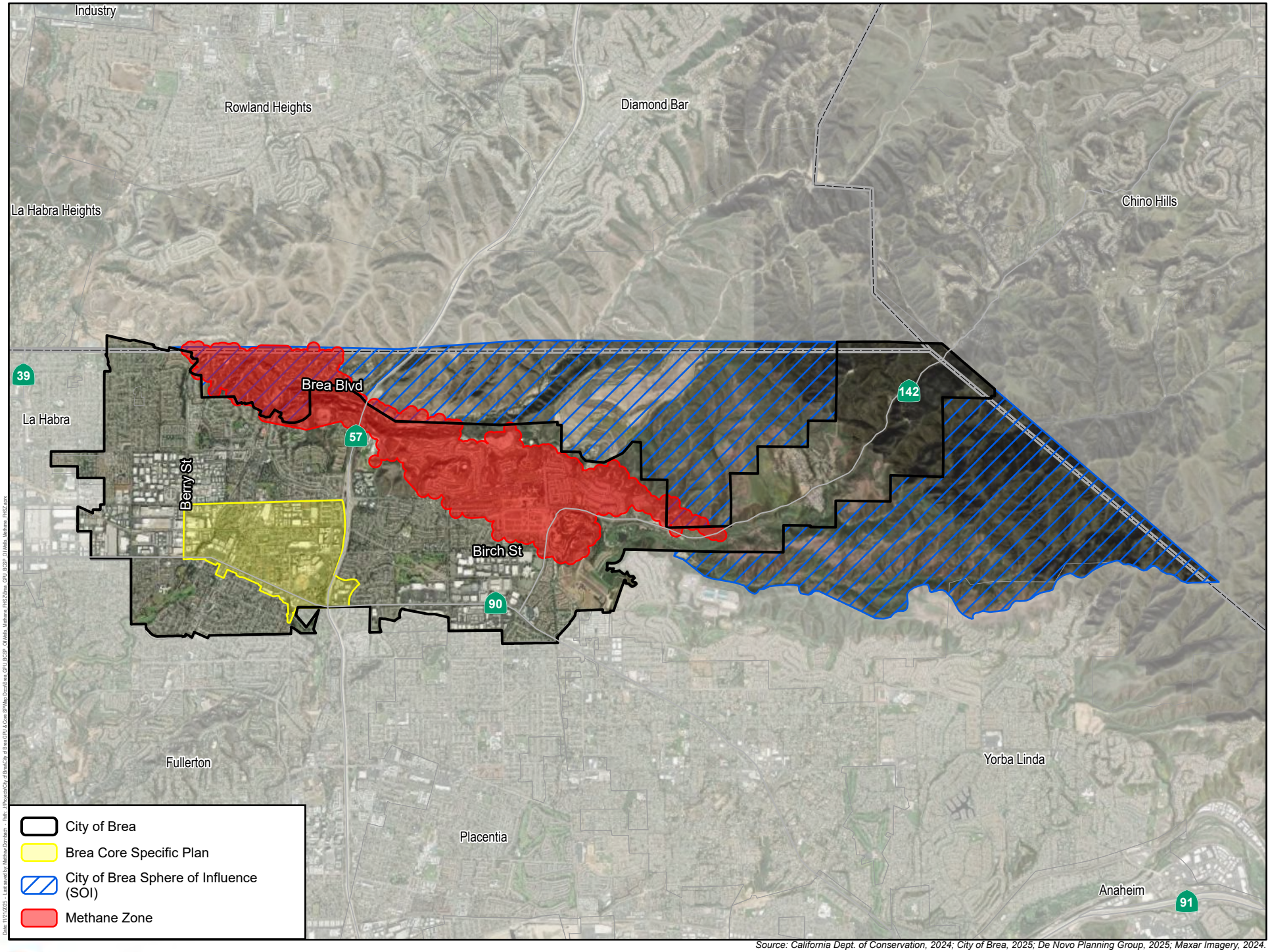


Source: De Novo Planning Group, 2025.

Harris & Associates

Figure 4.8-1
Oil and Gas Wells

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Source: California Dept. of Conservation, 2024; City of Brea, 2025; De Novo Planning Group, 2025; Maxar Imagery, 2024.

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Figure 4.8-2

Methane Zone

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Hazardous Sites

California Government Code, Section 65962.5, requires the California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites. The California Environmental Quality Act (CEQA) Guidelines (Public Resources Code [PRC], Section 21092.6) requires the lead agency to consult the lists compiled pursuant to Government Code, Section 65962.5, to determine if the project area is identified on any of the following lists:

- **USEPA National Priorities List:** Lists all sites under the USEPA Superfund program, which was established to fund the cleanup of contaminated sites that pose risks to human health and the environment.
- **USEPA CERCLIS and Archived Sites:** The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list contains 15,000 sites nationally identified as hazardous sites. This would also involve a review of archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.
- **USEPA RCRIS (RCRAInfo):** Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo) is a national inventory system for hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List:** The California DTSC maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for use by State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet:** DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS:** Leaking Underground Storage Tank Information System (LUSTIS). The SWRCB maintains an inventory of underground storage tanks and leaking underground storage tanks, which tracks unauthorized releases.

The DTSC's EnviroStor database and the SWRCB's GeoTracker database are the online databases that track hazardous material release sites on the lists identified compiled pursuant to Government Code, Section 65962.5. EnviroStor is the DTSC's data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further. GeoTracker is the SWRCB's database system used by the State board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks.

Reviews of the DTSC's EnviroStor database and the SWRCB's GeoTracker database indicate a variety of hazardous waste reporting facilities located throughout the City (Table 4.8-2, GeoTracker Sites in Brea; DTSC 2025; SWRCB 2025). Within the City of Brea, there are 132 sites identified by GeoTracker as "Completed – Case Closed" and 24 permitted USTs. GeoTracker also identifies one site that historically operated under WDRs, two inactive sites, two land disposal sites that are "operating" and accepting waste, one site undergoing remediation, one site undergoing site assessment, one site undergoing verification monitoring, four sites with received electronic submittals of information, and two military base cases, for a total of 17 hazardous sites. These hazardous sites have required regulatory oversight to address site contamination issues (Table 4.8-1, Status Definitions for Regulated Hazardous Sites, and Table 4.8-2). Of the EnviroStor sites, 12 sites are listed as No Action, No Action Required, No Further Action, or Closed. One site is active, 10 sites are inactive and need evaluation, two protective filer sites, and 14 have been referred to other agencies, for a total of 27 hazardous sites.

Table 4.8-1 defines each of the status categories for GeoTracker and EnviroStor, Table 4.8-2 provides a summary of the regulated hazardous sites identified by GeoTracker within City limits, and Table 4.8-3, EnviroStor Sites in Brea, provides a summary of the regulated hazardous sites identified by EnviroStor within City limits. GeoTracker sites that are identified as Completed – Case Closed and EnviroStor sites identified as No Action, No Action Required, No Further Action, or Closed are not shown in Table 4.8-2 and Table 4.8-3. There are no open GeoTracker sites within the BCSP area. All listed GeoTracker sites within the BCSP area have Completed – Case Closed status (SWRCB 2025). There are six regulated hazardous sites identified by EnviroStor within the BCSP boundaries (DTSC 2025).

Table 4.8-1. Status Definitions for Regulated Hazardous Sites

Status Category	Definition
GeoTracker	
Completed – Case Closed	A closure letter or other formal closure decision document has been issued for the site.
Historical – WDR	Sites that historically operated under WDRs issued by the SWRCB or a RWQCB.
Open – Inactive	No regulatory oversight activities are being conducted by the lead agency.
Open – Operating	A land disposal site that is accepting waste. These sites have been issued WDRs by the appropriate Regional Water Board.
Open – Remediation	The responsible party is implementing one or more approved remedy under an approved cleanup plan for the site. This includes any ongoing remedy that is either passive (e.g., long-term groundwater monitoring program) or active (e.g., treatment), or uses a combination of technologies.
Open – Site Assessment	Site characterization, investigation, risk evaluation, and/or site conceptual model development are occurring at the site. Examples of site assessment activities include, but are not limited to, the following: 1) identification of the contaminants and the investigation of their potential impacts; 2) determination of the threats/impacts to water quality; 3) evaluation of the risk to humans and ecology; 4) delineation of the nature and extent of contamination; 5) delineation of the contaminant plume(s); and 6) development of the Site Conceptual Model.
Open – Verification Monitoring	(Only for UST, Chapter 16 regulated cases) Remediation phases are essentially complete and a monitoring/sampling program is occurring to confirm successful completion of cleanup at the

Table 4.8-1. Status Definitions for Regulated Hazardous Sites

Status Category	Definition
	Site. (e.g., No "active" remediation is considered necessary or no additional "active" remediation is anticipated as needed. Active remediation system(s) has/have been shut-off and the potential for a rebound in contaminant concentrations is under evaluation).
Received	The electronic submittal of information has been received by the SWRCB.
EnviroStor	
No Action	No significant contamination was found, or any contamination present does not pose a threat to human health or the environment that requires a cleanup or further corrective measures.
No Action Required	Incident is minor, requiring no remedial action (Phase I Assessments).
No Further Action	DTSC has made a clear determination that the property does not pose a problem to the environment or to public health (Phase II Assessments).
Closed	The site owner or operator has completed all required cleanup, monitoring, or closure activities to the satisfaction of the DTSC.
Protective Filer	The facility has submitted an environmental filing, likely concerning hazardous materials, but is generally not considered an active enforcement target or major environmental concern at the time of reporting.
Inactive – Withdrawn	Regulatory activities have paused as the lead agency requested withdrawal and no longer seeks DTSC project approval.
Inactive – Needs Evaluation	Non-active sites where DTSC has determined a Preliminary Environmental Assessment or other evaluation is required.
Refer: Other Agency	Where contamination has not been confirmed and which were determined as not requiring direct DTSC Site Mitigation Program action or oversight. Accordingly, these sites have been referred to another State or local regulatory agency.
Active	Ongoing regulatory activities.

Notes: DTSC = California Department of Toxic Substances Control; RWQCB = Regional Water quality Control Board; SWRCB = State Water Resources Control Board; UST = underground storage tank; WDR = waste discharge requirements.

Table 4.8-2. GeoTracker Sites in Brea

Site Name	Address	Facility Type	GeoTracker Status
Akzo Nobel Coating Inc.	1215 W Lambert Rd	LUST Cleanup Site	Open – Verification Monitoring
Albertsons Distribution Center #6758	200 N Puente	Permitted UST	
Alron Oil Co	365 W Central Ave	Permitted UST	
AT&T California – Cb157	245 S Orange Ave	Permitted UST	
Brea 265 Property	Valencia Ave and Lambert Rd	Cleanup Program Site	Open – Site Assessment
Brea C Store and Gas	1200 E Imperial Hwy	Permitted UST	
Brea Car Wash	1700 E Lambert Rd	Permitted UST	
Brea Express Car Wash	300 S Brea Blvd	Permitted UST	
Brea Fire Station #3	2600 E Santa Fe Rd	Permitted UST	
Brea Fuel and Food	3300 E. Imperial Hwy	Permitted UST	
Brea-Olinda Oil Field	Puente Area	Historical – WDR	
Bridge Energy – Brea Olinda – UIC Project No. 07000009	2000 Toner Canyon Rd	UIC	Received

Table 4.8-2. GeoTracker Sites in Brea

Site Name	Address	Facility Type	GeoTracker Status
Bridge Energy – Brea Olinda – UIC Project No. 07000015	2000 Tonner Canyon Rd	UIC	Received
Bridgeland Resources, LLC – Brea-Olinda – Project No. 07000011	Section 8 T03s R09w	UIC	Received
Bridgeland Resources, LLC (Aka Wg Holdings SPV, LLC) – Coyote East – UIC Project No. 17800001	Section 22 T03s R10w	UIC	Received
Chevron Station #90786/2020	700 E. Imperial Hwy	Permitted UST	
Chevron West Coyote Hills	Gilbert St and Idaho St	Cleanup Program Site	Open – Site Assessment & Interim Remedial Action
City of Brea	1 Civic Center Cir Fl	Permitted UST	
Gold Coast Tours	105 Gemini Ave	Permitted UST	
Imperial Mariner, LLC	950 Mariner St	Permitted UST	
Imperial Mariner, LLC	915 W. Imperial Hwy	Permitted UST	
Imperial Mariner, LLC	975 W. Imperial Hwy	Permitted UST	
Lambert Gas	1203 W. Lambert Rd	LUST Cleanup Site	Open – Verification Monitoring
Lambert Gas	1203 W. Lambert Rd	Permitted UST	
Linn Operating, Inc. – Api # 05920082	120 S. Flower Hill St	UIC	Open
Mercury Insurance Group	1698 Greenbriar Ln	Permitted UST	
Mercury Insurance Group	555 W. Imperial Hwy	Permitted UST	
Mercury Insurance Group	1700 Greenbriar Ln Ste 101	Permitted UST	
Nike Battery 29		Military Base – 2 Cases	
Olinda Alpha Landfill	1942 N. Valencia Ave	Land Disposal Site	Open – Operating
Peterson Brothers Construction, Inc.	1560 W. Lambert Rd	Permitted UST	
So Cal Gas Co – Brea Base Transmission	2191 E. Birch St	Permitted UST	
Speedway No. 4054	120 E. Imperial Hwy	Permitted UST	
Speedway No. 5086	718 S. Brea Blvd	Permitted UST	
Thompson Drill Site	16500 Birch St	Cleanup Program Site	Open – Inactive
United #009	798 N. Brea Blvd	Permitted UST	
United Pacific 0680	2405 E. Imperial Hwy	Permitted UST	
Unocal – Brea Chemical Plant	2601 E. Imperial Hwy	Cleanup Program Site	Open – Remediation
Unocal Oil Leases, Brea		Cleanup Program Site	Open – Inactive
Valencia Greenery	1942 Valencia Ave	Land Disposal Site	Open – Operating

Source: SWRCB 2005.

Notes: UST = underground storage tank; UIC = underground injection control.

Table 4.8-3. EnviroStor Sites in Brea

Site Name	Address	Program Type	EnviroStor Status
Ameron Inc	595 W. Lambert Rd	Evaluation	Inactive – Needs Evaluation
Brea Gateway	101-407 W. Imperial Hwy	Voluntary Cleanup	Active
CC Industries	428 Berry Way	Tiered Permit	Inactive – Needs Evaluation
Carbon Canyon Road Widening Project	Valencia Ave & Carbon Canyon Rd	Evaluation	Refer: 1248 Local Agency
Century Rim Corporation	1225 W. Imperial Hwy	Tiered Permit	Inactive – Needs Evaluation
Columbia Stearns Middle School	Lambert Rd/Valencia Ave	School Investigation	Inactive – Needs Evaluation
Direct Foto	2903 Saturn St #H	Tiered Permit	Refer: Local Agency
Etrolite Corp/Tretolite Div	Brea	Haz Waste	Protective Filer
Fineline Circuits & Technology, Inc.	594 Apollo St	Tiered Permit	Refer: Local Agency
Heraeus Amersil, Inc. – Brea	520 W. Central Ave	Tiered Permit	Refer: Local Agency
Honetreat	400 N. Berry St	Historical	Refer: Other Agency
Lower Tank Farm – Brea Olinda	17001 Carbon Canyon Rd	Evaluation	Refer: 1248 Local Agency
NI Industries, Inc., Automotive Wheel	1225 W. Imperial Hwy	Tiered Permit	Inactive – Needs Evaluation
Nuevo Energy – Tentative Tract #16047	2700 E. Lambert Rd	Evaluation	Refer: 1248 Local Agency
Olinda Ranch Elementary	17001 E. Carson Canyon Rd	School Investigation	Inactive – Needs Evaluation
Petrolite Corp – Tretolite	200 S. Puente St	Historical	Refer: Other Agency
Petrolite Corp/Tretolite Div	200 S. Puente St	Haz Waste	Protective Filer
R & R Circuits, Div. Of Interlink Circuits	584 Explorer St	Tiered Permit	Inactive – Needs Evaluation
Stearns Fee Property	Wildcat Way/Tonner Canyon	School Investigation	Inactive – Needs Evaluation
Thompson – Hayward Chemical Corp	111 S. Berry St	Historical	Refer: Other Agency
Winonics – Brea	660 N. Puente St	Tiered Permit	Refer: Local Agency
Brea Core Specific Plan			
Ameron (Corrosion Resistant Piping Div)	536 Vanguard Way	Historical	Refer: Other Agency
Bristol Industries	630 E. Lambert Rd	Evaluation	Inactive – Needs Evaluation
Calafia Industries, Inc	540 W. Lambert	Historical	Refer: Other Agency
Kirkhill Rubber Company	360 E. Cypress St	Historical	Refer: RCRA / HWMP
Thompson Drill Site	16500 Birch St	Evaluation	Refer: 1248 Local Agency
Tri-Star Engineered Products, Inc	351 Thor Pl	Tiered Permit	Inactive – Needs Evaluation

Source: DTSC 2025.

Notes: RCRA = Resource Conservation and Recovery Act; HWMP = Hazardous Waste Management Plan.

Hazardous Materials Management

The Orange County Environmental Health Hazardous Materials (HazMat) Team operates 24/7, providing emergency response to protect public health and safety. The Health Hazmat Team responds to incidents involving hazardous materials and waste, addressing potential threats from physical, chemical, biological, radiological, and energetic hazards throughout the County. Their primary duties are to provide regulatory guidance and technical expertise to mitigate and oversee the removal of hazardous substances and to investigate hazardous materials incidents. Typical Health Hazmat Team responses include:

- Hazardous material spills
- Environmental investigations
- Clandestine drug and explosive labs operations
- Terrorism incidents
- Chemical complaints

The Health Hazmat Team is part of the County Joint Hazard Assessment Team and trains with local law enforcement, including Specialized Weapons and Tactics (SWAT), Bomb Squad, Fire Hazmat, Federal Bureau of Investigation (FBI), and the Civil Support Team to respond to high hazard incidents. All members of the Health Hazmat Team are California State Certified Technicians and Specialists, Deputized Health Officers with the healthcare agency, and are training Terrorism Liaison Officers with the Orange County Intelligence Assessment Center (Orange County 2025).

The City has adopted an Emergency Operations Plan and maintains an Emergency Operations Center at the Civic and Cultural Center located at 1 Civic Center Circle. The Emergency Preparedness Program is coordinated by a full-time Emergency Preparedness Coordinator that is assigned to the Brea Community Development Department. The Brea Fire Department, Suppression Division, coordinates hazardous material and disaster preparedness planning and appropriate response efforts with City departments. The Brea Fire Department is responsible for conducting compliance inspections for regulated facilities in the City that handle hazardous material, generate or treat hazardous waste, and/or operate a UST. The Brea Fire Department observes the 2025 (or most recent) version of the California Fire Code for usage, storage, handling, and transportation requirements for hazardous materials.

Sensitive Land Uses

Land uses that are particularly sensitive to the release of hazards or hazardous materials include residential, educational, assisted living, daycare, and agricultural uses. In particular, CEQA requires analysis of proposed projects that may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or planned school. Schools within the City of Brea are listed in Table 4.8-4, Schools in the City of Brea.

Table 4.8-4. Schools in the City of Brea

School Name	Address	Public or Private
Arovista Elementary School	900 Eadington Drive	Public
Laurel Elementary School	200 South Flower Street (BCSP)	Public
Country Hills Elementary School	150 North Associated Road	Public
Falcon Academy of Science & Technology	650 North Apricot	Public
Mariposa Elementary School	1111 West Mariposa Drive	Public
Olinda Elementary School	3145 East Birch Street	Public
Brea Junior High School	400 North Brea Boulevard	Public
Brea Olinda High School	789 North Wildcat Way	Public
Brea Canyon Continuation High School	689 North Wildcat Way	Public
Christ Lutheran Elementary School	820 West Imperial Highway	Private
Future Minds Montessori School	408 South Flower Avenue	Private
Heights Christian Schools – Brea Campus	200 South Associated Road	Private
Montessori of Brea	701 Mulberry Avenue	Private
Optimus Learning School – Brea	740 North Brea Boulevard	Private
Optimus Learning School – Placentia/Yorba Linda	3230 East Imperial Highway #125	Private
St Angela Merici Parish School	575 South Walnut Avenue	Private
REFINERY Preschool	123 West Ash Street Suite B (BCSP)	Private
Childtime of Brea	705 East Birch Street (BCSP)	Private

Source: City of Brea GIS.
Notes: (BCSP) indicates that the location is within the Brea Core Specific Plan area.

Airports

There are no public airports or private airstrips within the City of Brea. The nearest airports to the City boundaries are Fullerton Municipal Airport and Orange County Steel Salvage Heliport, located approximately 4.28 miles southwest and 3.96 miles south, respectively. As noted in the Fullerton Airport Environs Land Use Plan, the airport influence area includes all areas within 10,000 feet (1.89 miles) from the nearest point of the runway. Therefore, the City is entirely outside the airport influence area for the Fullerton Municipal Airport. In addition, Helipad Protection Zones extend 280 feet (0.05 miles) from the edge of the final approach and takeoff area. Therefore, the City is entirely outside the Helipad Protection Zones for the Orange County Steel Salvage Heliport.

Wildfire

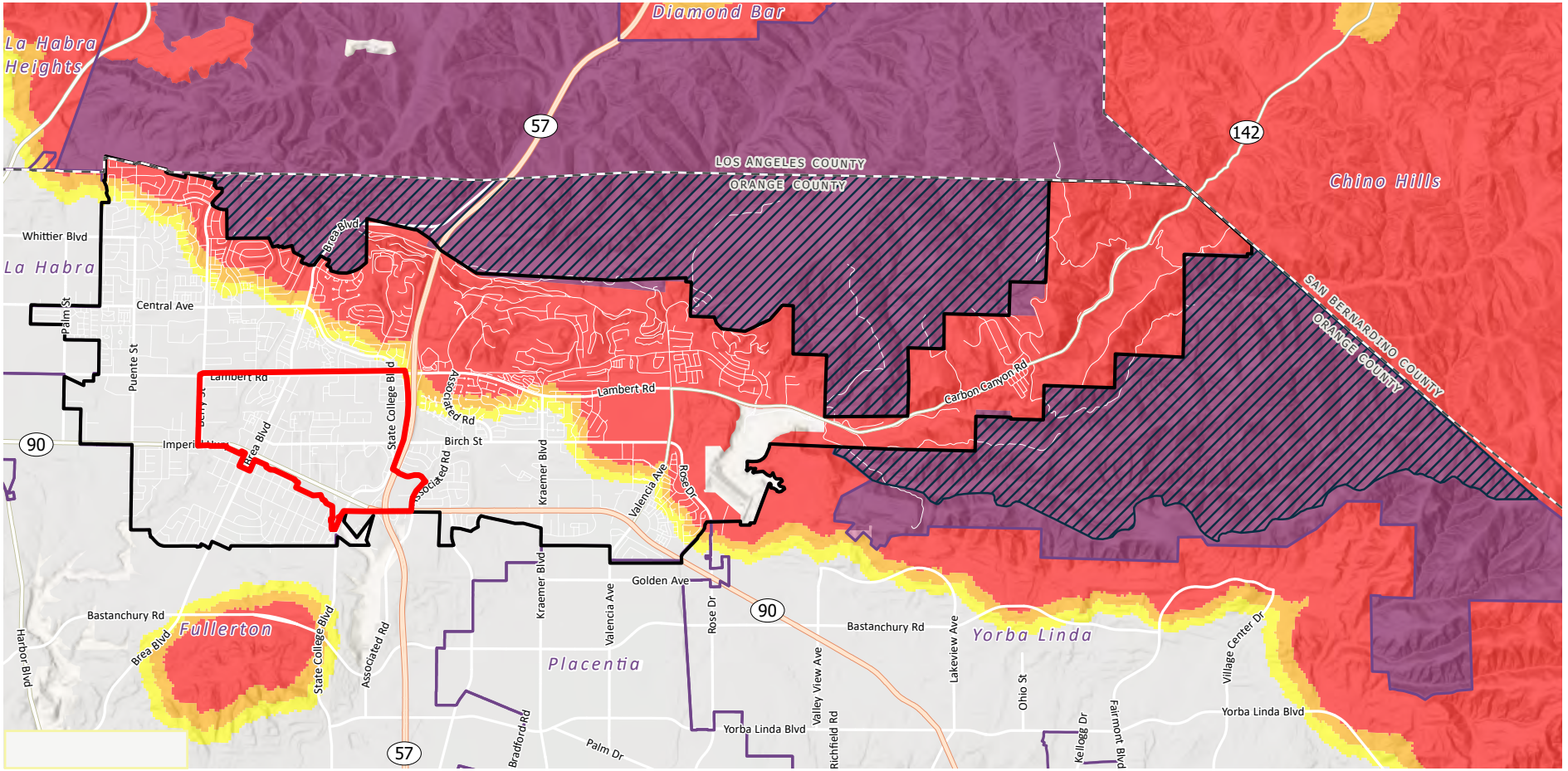
Figure 4.8-3, Fire Hazard Severity Zones, shows that the northernmost and easternmost portion of the City boundary where more hilly and mountainous regions of the City of Brea are designated as a very high fire hazard severity zone (very high FHSZ). This includes neighborhoods of concern for evacuation like Blackstone, Olinda Village, and Heritage Hills. On the southern edge of the very

high FHSZ boundary lies the High Fire Hazard Severity Zone and on the southern edge of the high FHSZ lies the moderate FHSZ. Only the northeastern corner of Brea Core Specific Plan area lies within the moderate FHSZ. The City of Brea Sphere of Influence (SOI) area contains a large portion of land in the very high FHSZ.

4.8.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the project would have a significant impact on hazards and hazardous materials if it would:

- **Threshold HAZ-a:** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- **Threshold HAZ-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.
- **Threshold HAZ-c:** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- **Threshold HAZ-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.
- **Threshold HAZ-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, result in a safety hazard or excessive noise for people residing or working in the project area.
- **Threshold HAZ-f:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- **Threshold HAZ-g:** Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.



LEGEND

- Brea City Boundary
- Brea Sphere of Influence
- Other Incorporated Area
- County Boundary
- Brea Core Specific Plan Area

Fire Hazard Severity Zones in Local Responsibility Areas

- Very High
- High
- Moderate
- NonWildland

Fire Hazard Severity Zones in State Responsibility Areas

- Very High
- High
- Moderate*

* This category is not present within the mapped extent

Source: De Novo Planning Group, 2026.

Harris & Associates

N

0 0.5 1

Miles

Figure 4.8-3

Fire Hazard Severity Zones

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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4.8.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and help reduce or avoid potential impacts related to hazards and hazardous materials:

PPP HAZ-1 **Transportation of Hazardous Waste.** Hazardous materials and hazardous wastes will be transported to and/or from the project developed under the Focused General Plan Update and the Brea Core Specific Plan in compliance with applicable State and Federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.

PPP HAZ-2 **Resource Conservation and Recovery Act.** Hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (Code of Federal Regulations, Title 40, Part 263), including the management of nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances.

PPP HAZ-3 **Certified Unified Program Agency.** Development under the Focused General Plan Update and the Brea Core Specific Plan will be designed and constructed in accordance with the regulations of the Orange County Health Care Agency Environmental Health Department (OCHCA-EHD), which serves as the designated Certified Unified Program Agency. OCHCA-EHD implements State and Federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) California Accidental Release Prevention, (4) Aboveground Storage Tank Program, and (5) Underground Storage Tank Program.

PPP HAZ-4 **California UST Regulations.** Underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California UST Regulations (California Code of Regulations, Title 23, Chapter 16). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the Regional Water Quality Control Board, Department of Toxic Substances Control, Brea Fire Department, South Coast Air Quality Management District, and/or other regulatory agencies, as necessary. Use of existing USTs will also have to be conducted (i.e.,

used, maintained and monitored) in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations).

PPP HAZ-5 **Asbestos-Containing Materials and Lead-Based Paints.** Demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials or lead-based paint are required to be conducted in accordance with applicable regulations, including, but not limited to:

- South Coast Air Quality Management District's Rule 1403
- California Health and Safety Code (Section 39650 et seq.)
- California Code of Regulations (Title 8, Section 1529)
- California Occupational Safety and Health Administration regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])
- Code of Federal Regulations, Title 40, Part 61 (asbestos); Title 40, Part 763 (asbestos); and Title 29, Part 1926 (asbestos and lead)

PPP HAZ-6 **Removal of Hazardous Materials.** The removal of hazardous materials, such as polychlorinated biphenyls (PCBs), mercury-containing light ballast, and mold, will be completed in accordance with applicable regulations pursuant to 40 Code of Federal Regulations (CFR) 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response training, as outlined in 29 CFR Section 1910.120 and 8 California Code of Regulations, Section 5192.

PPP HAZ-7 **Removal of Utility Lines and Pipelines.** New construction, excavations, and/or new utility lines within 10 feet of or crossing existing high-pressure pipelines, natural gas/petroleum pipelines, or electrical lines greater than 60,000 volts will comply with the California Code of Regulations, Title 8, Section 1541.

PPP HAZ-8 **Design and Safety.** Development will comply with the requirements of the Brea City Code, Title 8, Health, Safety, and Welfare, and all applicable design and safety standards and regulations in the California Building Code.

PPP HAZ-9 **Brea Local Hazard Mitigation Plan.** The City of Brea will comply with the Local Hazard Mitigation Plan by implementing the mitigation action items identified in Table 5-3, Mitigation Actions Implementation Plan, of the Local Hazard Mitigation Plan. These actions address topics such as Emergency Preparedness Activities, Multiple Hazards, Earthquake Hazards, Wildland/Urban Fires, Human-Caused Hazards (Hazardous Materials, Active Shooter/Terrorism), Severe Weather

(Windstorm, Extreme Heat, Winter Storm), Geologic Hazards (Landslide, Soil Erosion), and Flooding (including Dam Failure).

PPP PS-2 **Development Fees.** Development under the Focused General Plan Update and the Brea Core Specific Plan will be required to pay the latest adopted Development Fees (e.g., Fire Department plan check and inspection fees, fire service connection fees, dispatch impact fees, and fire impact fees), as applicable.

PPP PS-5 **Fire Safety Standards.** For each new development facilitated under the Focused General Plan Update and the Brea Core Specific Plan, fire plans shall be submitted and reviewed by the Brea Fire Department to ensure compliance with fire safety and emergency response standards.

PPP PS-6 **Fuel Modification Standards.** All development under the Focused General Plan Update will be designed, built, and operated in accordance with the Brea Fire Department's Very High Fire Hazard Severity Zone–Fuel Modification requirements, if applicable.

PPP TRA-2 **Traffic Control and Staging.** A site-specific construction worksite staging and traffic control plan within the public right-of-way will be prepared and submitted to the City of Brea for review and approval prior to the start of any construction work. This plan will include such elements as the location of any potential partial lane closures within the public right-of-way, hours during which lane closures (if any) would not be allowed, local traffic detours (if any) that may require rerouting of traffic through the public right-of-way, and protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs). The project applicant will be required to comply with the City-approved plan measures, including any specific regulations for construction activities and traffic control in the public right-of-way.

The new or updated general plan goals and policies related to hazards and hazardous materials are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the Program Environmental Impact Report (PEIR).

4.8.4 Environmental Impacts

The following sections address various potential impacts relating to hazards and hazardous materials that could result from implementation of the Project.

4.8.4.1 Threshold HAZ-a: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

The Proposed Project is a General Plan Update, which involves changes in land use designations for various parcels throughout the City. When future projects consistent with the Focused GPU are brought forward, construction would likely involve small amounts of hazardous materials such as fuels, lubricants, solvents, and architectural coating materials. During operation, hazardous materials may be used for cleaning and maintenance, as well as manufacturing activities. Hazardous materials and wastes would be managed and used in accordance with all applicable Federal, State, and local laws and regulations (refer to Section 4.8.1.1, Regulatory Setting, and Section 4.8.3, Plans, Programs, and Policies). This includes handling of any soils with potential for ACMs and lead-based paint contamination in accordance with Cal/OSHA requirements and release reporting, initial abatement, and corrective actions for any unauthorized release of hazardous materials with oversight from the RWQCB, DTSC, Brea Fire Department, SCAQMD, OCHCA Environmental Health Division, and other regulatory agencies, as necessary. In addition, disposal of any contaminated material would be in accordance with State and County regulations including the OCHCA Environmental Health Division CUPA requirements. These regulations are intended to address proper transport of hazardous materials, as well as methods to address accidental spills, to avoid impacts to people and the environment. With regulatory compliance, hazardous impacts to the public and the environment would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.4.2 Thresholds HAZ-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.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

Demolition and Construction Activities

Demolition and construction activities associated with future development enabled under the Focused GPU and BCSP would involve the use of common hazardous materials, including petroleum products, solvents, paints, and other regulated materials. However, construction activities would not involve a significant amount of hazardous materials, and their use would be temporary.

The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with regulations of several agencies—the USEPA, OSHA, Cal/OSHA, and U.S. Department of Transportation. Construction projects typically maintain supplies on site for containing and cleaning small spills of hazardous materials. Pursuant to the Code of Federal Regulations, Title 29, Part 1910.1200, the property owner/developer for each project would ensure training for project construction workers on the proper use, storage, and disposal of hazardous materials would occur. The standard states that "employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals" (Code of Federal Regulations, Title 29, Part 1910.1200). Therefore, impacts would be less than significant.

Operation

Following the completion of construction, new residential and mixed-use development enabled under the Project would generally involve the use of household cleaners and solvents, which would not be used in large quantities that could generate a significant hazard and are managed through existing municipal solid waste disposal and recycling programs in the City (refer to Section 4.15, Utilities and Service Systems). Implementation of the Focused GPU and BCSP would not expand existing oil and natural gas production. However, the Proposed Project would expand industrial uses within the City, which generally involve the transport, use, and disposal of hazardous materials that could pose a significant hazard to the public or the environment through potential release of hazardous materials into the environment. While potential future development enabled under the Focused GPU and BCSP would likely involve the routine transport, use, and disposal of hazardous materials, all operational activities would be required to adhere to Federal, State, and local regulations for the management and disposal of hazardous materials. For instance, businesses that handle hazardous materials such as hazardous waste or substances at reportable quantities are required to submit an HMBEP to the California Environmental Reporting System. The CUPA then verifies this information and provides it to agencies that are responsible for the protection of public health and the environment. Therefore, conformance with all applicable Federal, State, and local regulations would ensure impacts would be less than significant.

Hazardous Materials Sites

The Proposed Project would allow for future development on land that has either known or the potential for unknown soil or groundwater contamination that could result in hazardous material upset. Disturbance of contaminated surface soils or groundwater could subject workers, neighboring land uses, and future residents to hazardous substances. The potential for exposure to contaminated sites differs Citywide, as described below.

As described in Section 4.8.1.2, Existing Conditions, there are a number of hazardous sites identified by GeoTracker and EnviroStor within the City of Brea (DTSC 2025; SWRCB 2025; Table 4.8-2). Given the potential for future development allowed under the Proposed Project to occur in proximity to these hazardous sites, buildout may have the potential to create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Grading and excavation in developed areas may expose construction workers and the public to known or potentially unknown hazardous materials in the soil or groundwater. Therefore, development on these sites has the potential to release hazardous materials into the environment.

However, as described further in Section 4.8.4.4, Threshold HAZ-d, remediation would be required to satisfy the appropriate agencies—DTSC, RWQCB, and the OCHCA Environmental Health Division—where known soil or groundwater contamination exists through standard grading and building permit application processes and would prevent exposure of people and the environment to these hazards. Existing Federal, State, and local regulations, as well as site-specific remediation plans and requirements mandated by existing regulations (e.g., Unified Program) and enforced by regulatory agencies and CUPAs, address remediation requirements following the discovery of contamination. Therefore, implementation of all applicable Federal, State, and local regulations reduce the potential for hazardous conditions related to accidental release of hazardous materials or disturbance of hazardous materials sites. Refer to Section 4.8.4.4 for further discussion of these regulatory requirements. With implementation of existing regulatory requirements, impacts would be less than significant.

Oil and Gas

General Plan policy allows oil and natural gas industries as well as other industries that use, store, transport, or generate hazardous materials to locate within areas designated General Industrial and Light Industrial land uses. However, implementation of existing regulatory requirements in land remediation would ensure that the impacts of the previous oil and natural gas industries are reduced to a less than significant level. The long-existing extraction and ancillary operations in hillside areas are permitted to continue as "grandfathered" uses, and the Project would not expand these existing operations or allow for new oil and natural gas production.

There are no oil and natural gas uses within the proposed BCSP area. In addition, wherever alternative uses are proposed on or adjacent to former oil field operations, applicable Federal, State, and local regulations require the applicant/developer to conduct extensive environmental analysis and provide mitigation to reduce impacts to less than significant levels. For example, the Brea Fire Code includes several sections with requirements for methane mitigation, such as requirement of a construction permit for the installation or modification of a methane mitigation system. All projects with sources of methane soil gas are subject to methane soil gas testing, passive or active mitigation, and methane detection and alarm systems. Further, any new

construction within the City, including future development associated with the Proposed Project and additions or modifications to a lot or existing building, within a combustible soil-gas Impact Area (i.e., property within 300 feet of a petroleum reservoir's boundary) is required to conform to the current adopted City of Brea Combustible Soil-Gas Ordinance.

Given the potential for combustible gases to accumulate in or under buildings or structures, the City of Brea Combustible Soil-Gas Ordinance requires a comprehensive soil-gas investigation for all properties that lie wholly or partially within a combustible soil-gas Impact Area prior to new development being built. In addition, all new developments that are wholly or partially within a combustible soil-gas Impact Area require at least the minimum criteria for combustible soil-gas mitigation, regardless of soil-gas concentrations, and are subject to several requirements. For instance, prior to the installation of a soil-gas mitigation system, plans must be submitted to the Brea Fire Department and designed and installed in accordance with those plans. All combustible soil-gas mitigation systems installed are subject to inspection and approval by City inspectors. Additionally, the Brea Fire Department must receive at least 48 hours notice prior to completion of below-grade mitigation elements, and prior to covering said systems; installation and/or application of membrane barrier materials; testing of membrane barrier materials; and completion of passive vent systems inside buildings, and prior to covering said systems.

If combustible soil gas concentrations greater than 5,000 parts per million are identified at a given location, all buildings within 300 feet of that location are required to implement full mitigation. Full mitigation includes all of the following:

- Below-grade passive venting equally spaced under all foundation slabs with multiple vent risers.
- Vapor impermeable membrane (as described below) under all foundations.
- Utility dams (as described below) at the edge of each foundation and throughout Project area.
- Post-tension reinforcement and monolithic concrete pour of all concrete foundations and slabs.
- All penetrations/voids in slabs sealed with an expanding 50-year foam.
- Wye-seals in all dry utilities.

All cleaning, dismantling, and removal of oil field production tanks shall be conducted in compliance with permitting, sampling, monitoring, and handling requirements of the applicable regulatory oversight agency or agencies. Implementation of all applicable Federal, State, and local regulations reduces the potential for hazardous conditions related to accidental release of oil and gas or accumulated combustible gases in or under buildings or structures. With the implementation of existing regulatory requirements, impacts would be less than significant.

Aboveground and Underground Storage Tanks

The removal of any aboveground storage tanks or USTs shall be conducted in accordance with the regulations of OCHCA Environmental Health Division, which serves as the designated CUPA. The OCHCA Environmental Health Division implements State and Federal regulations for the Aboveground Storage Tank Program and Underground Storage Tank Program. Furthermore, any UST removals will be conducted in accordance with the California UST Regulations (23 CCR Chapter 16).

Asbestos-Containing Material and Lead-Based Paint

Demolition of existing structures (particularly those developed before the 1980s) could result in the release of ACM or LBP that could result in potential exposure of workers or residents living near these project sites to these hazardous materials. However, demolition of structures for future development throughout the City would be required to comply with the existing Federal, State, and local rules and regulations related to testing and removal of ACM and LBP through the building permit process. For example, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) provides requirements for limiting asbestos emissions from building demolition and renovation activities, including thorough facility surveys for the inspection, identification, and quantification of all friable, and Class I and Class II non-friable ACM for any demolition or renovation activity. The National Emission Standards for Hazardous Air Pollutants, Federal OSHA, Cal-OSHA, and California Health and Safety Code include requirements for emission controls and waste disposal during removal of ACM. In addition to asbestos surveys, the National Emission Standards for Hazardous Air Pollutants includes requirements for notifications prior to beginning a renovation or demolition project, work practice standards, and ACM disposal. Cal-OSHA requires that contractors with specialized asbestos training and who are registered with Cal-OSHA must be used for asbestos removal projects. Contractors without special asbestos training must ensure that the job site is free of ACM before starting renovation or demolition work. The National Emission Standards for Hazardous Air Pollutants requires that asbestos-containing waste materials be sealed in leak-tight, properly labeled containers and disposed of only at approved sites. Similarly, OSHA requires safe work practices during demolition and renovation, worker training, disposal of asbestos waste, and specification of permissible exposure limits pursuant to 29 Code of Federal Regulations (CFR) 1926.1101.

Additionally, the USEPA and U.S. Department of Housing and Urban Development developed regulations for disclosing the presence of LBP for housing built before 1977 and Federally funded housing. The USEPA's Lead-Based Paint Abatement Program regulations provide a framework for lead abatement, risk assessment and inspections. Those performing these services are required to be trained and certified by the USEPA or an authorized State. With implementation of existing regulatory requirements, the Project would have less than significant impacts related to ACM and LBP.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.4.3 Threshold HAZ-c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact Analysis

Focused General Plan Update

The Brea Olinda Unified School District operates six elementary schools, one junior high school, one high school, and one continuation high school within the City. Additionally, there are nine private schools within the Project area (refer to Table 4.8-4). Project construction would include the handling of hazardous materials, substances, and waste. Construction activities would require the operation of heavy equipment (e.g., dozers, excavators, tractors) that would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the opportunity sites during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, nearby schools, the public, and the environment. Construction contractors are required to comply with all applicable Federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the USEPA, DTSC, and Santa Ana RWQCB. Water quality regulations are further discussed in Section 4.9, Hydrology and Water Quality, of this PEIR. Air quality health risks are discussed further in Section 4.2, Air Quality, of this PEIR.

The eventual buildout of the Focused GPU could require additional schools, one or more of which may be located in the vicinity of a use which may handle or emit hazardous materials. However, the siting of public school facilities is determined by individual school districts, based on criteria established by the California Department of Education. Siting of new school facilities is subject to review and approval by the California Department of Education and the DTSC to help ensure school sites are not located on or near identified hazardous materials sites unless remedial actions have been conducted and no further action determination have been issued.

The siting and operation are regulated through the City's permitting process, which ensures that sensitive land uses, such as private schools and daycare facilities, are not located in proximity to incompatible uses, including hazardous materials or hazardous waste facilities. Childcare centers and preschools are additionally regulated by the California Department of Social Services under Title 22, Division 12 of the CCR, which mandates licensing requirements to ensure facilities are

clean, safe, and protected from hazards. While schools may store and use small quantities of common hazardous materials (e.g., pesticides, paints, cleaners), such use occurs at levels that would not result in substantial hazardous emissions or hazardous waste generation. These activities are also regulated through applicable school district protocols and State regulations.

Overall, implementation of existing applicable regulatory requirements would ensure that future development consistent with the Focused GPU would have less than significant hazardous materials impacts on schools. Therefore, implementation of the Project would not result in an impact associated with hazardous emissions or handling of hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

One public school (Laurel Elementary School) and two private childcare/preschool facilities are located within the BCSP boundaries. Increased development intensity in the BCSP area could introduce the potential for hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of these existing schools.

However, similar to the Focused GPU, the siting and development of public schools would continue to be regulated by the existing California Department of Education and DTSC requirements, which ensure that school operations are not adversely affected by nearby hazardous materials uses. Private schools and childcare facilities would continue to be regulated through existing State licensing requirements and the City's permitting processes, which are designed to prevent incompatible land uses—such as facilities that store or handle hazardous materials—from being located near sensitive receptors.

With continued compliance with these existing regulatory requirements and permitting processes, development under the BCSP would not result in hazardous emissions or the handling of hazardous materials at levels that would adversely affect nearby schools. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.4.4 Thresholds HAZ-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.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

The Proposed Project could allow for future development on a site which is included on a list of hazardous materials sites. As described in Section 4.8.1.2, Existing Conditions, there are 16 hazardous sites identified by GeoTracker and 27 sites identified by EnviroStor within the City of Brea, not including completed/closed cases or permitted USTs (DTSC 2025; SWRCB 2025; Table 4.8-2). These hazardous sites have required regulatory oversight to address site contamination issues. Given the potential for future development allowed under the Proposed Project to occur in proximity to these hazardous sites, buildout may have the potential to create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Certified, inactive, or previously closed hazardous sites that may also have residual contamination and existing land use controls (e.g., soil management plans). Further, cleanup at previously closed sites may have been conducted to meet standards for the existing land uses rather than the more stringent standards for residential uses. Grading and excavation in developed areas may expose construction workers and the public to known or potentially unknown hazardous materials in the soil or groundwater. Therefore, development on these sites has the potential to release hazardous materials into the environment.

Some regulatory processes, including SARA, CWA/SPCC, OSHA standards, CCR, and BCC Chapter 8.42, would serve to minimize impacts from potential release of hazardous materials as a result of future development enabled under the Proposed Project. For example, SARA requires reporting for businesses that store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under Federal laws and this data is made available to Federal authorities, local agencies, and the public to avoid accidental releases of hazardous materials. The CWA and SPCC Rule require facilities to prepare, amend, and implement SPCC plans that minimize the potential for discharges, particularly of oil, and OSHA requires safe work practices during construction activities. Similarly, the HMBEP program requires businesses that handle hazardous materials such as hazardous waste or substances at reportable quantities to submit an HMBEP to the California Environmental Reporting System. The OCHCA Environmental Health Division monitors and regulates identified industries in the City that have a stationary source of hazardous materials through CalARP. The potential hazardous threat of CalARP facilities is determined by completing a land use compatibility analysis. CalARP also requires the development and implementation of a Risk Management Plan. In addition, several State statutes require immediate notification of significant spills or threatened releases. Notification is required

regarding significant releases from facilities, vehicles, vessels, pipelines, and railroads. In addition, releases that result in injuries or harmful exposure to workers must be immediately reported to the Cal/OSHA pursuant to the California Labor Code, Section 6409.1(b).

Where known soil or groundwater contamination exists, remediation would be required to satisfy the appropriate agencies—DTSC, RWQCB, and the OCHCA Environmental Health Division—through standard grading and building permit application processes and would prevent exposure of people and the environment to these hazards. Existing Federal, State, and local regulations as well as site-specific remediation plans and requirements mandated by existing regulations (e.g., Unified Program) and enforced by regulatory agencies and CUPAs, address remediation requirements following the discovery of contamination. For example, Title 22, Division 4.5 of the CCRs provides guidance regarding the removal of hazardous materials during demolition activities.

In accordance with Federal, State, regional, and local requirements, any new development or redevelopment that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. Compliance with the CUPA for Orange County (PPP HAZ-3) would ensure that projects would identify and remediate hazardous materials. Furthermore, compliance with Public Safety Element policies regarding the handling of hazardous materials would further support the City's goal of minimizing land use conflicts and safety hazards associated with hazardous sites (refer to the Focused GPU PS-4 Policies included in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to this PEIR).

Therefore, implementation of all applicable Federal, State, and local regulations reduce the potential for hazardous conditions related to accidental release of hazardous materials or disturbance of hazardous materials sites. With implementation of existing regulatory requirements, impacts would be less than significant.

Oil and Gas

As described in Section 4.8.4.2, Threshold HAZ-b, there are no oil and natural gas uses within the proposed BCSP area. In addition, wherever alternative uses are proposed on or adjacent to former oil field operations, implementation of existing regulatory requirements in land remediation would ensure that the impacts of the previous oil and natural gas industries are reduced to a less than significant level. The long-existing extraction and ancillary operations in hillside areas are permitted to continue as "grandfathered" uses, and the Project would not expand these existing operations or allow for new oil and natural gas production.

For example, the Brea Fire Code includes several sections with requirements for methane mitigation, such as requirement of a construction permit for the installation or modification of a methane mitigation system. All projects with sources of methane soil gas are subject to methane

soil gas testing, passive or active mitigation, and methane detection and alarm systems. All projects shall be required to conform to the current adopted City of Brea Combustible Soil-Gas Ordinance. Further, additions or modifications to a lot or existing building in any identified methane area that expands the original footprint, shall be required to add methane mitigation requirements per the current adopted City of Brea Combustible Soil-Gas Ordinance. With the implementation of existing regulatory requirements, impacts would be less than significant.

Aboveground and Underground Storage Tanks

The removal of any aboveground storage tanks or USTs shall be conducted in accordance with the regulations of OCHCA Environmental Health Division, which serves as the designated CUPA. The OCHCA Environmental Health Division implements State and Federal regulations for the Aboveground Storage Tank Program and Underground Storage Tank Program. Furthermore, any UST removals will be conducted in accordance with the California UST Regulations (23 CCR Chapter 16).

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.4.5 Threshold HAZ-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, result in a safety hazard or excessive noise for people residing or working in the project area.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

As described in Section 4.8.1.2, the City is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airports to the City boundaries are Fullerton Municipal Airport and Orange County Steel Salvage Heliport, located approximately 4.28 miles southwest and 3.96 miles south, respectively. The City is entirely outside the airport influence area for the Fullerton Municipal Airport and the Helipad Protection Zones for the Orange County Steel Salvage Heliport. Therefore, implementation of the project would not result in a safety hazard or excessive noise for people residing or working in the project area. No impact would occur.

Level of Significance Before Mitigation: No impact.

Mitigation Measures: No mitigation measures are required.

4.8.4.6 Threshold HAZ-f: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

Focused General Plan Update

The Brea Fire Department provides emergency response for hazardous material incidents and administers the fire prevention programs. The City of Brea Community Development Department administers the City's Emergency Preparedness Program, which consists of the development and maintenance of the City's Emergency Response Plan and the City's Emergency Operations Center. These programs outline coordinated responses to major emergencies such as earthquakes, hazardous materials accidents, wildfire, and dam failure, and describe evacuation procedures and overall emergency management objectives, including injury prevention and the protection of life and property.

The Cities of Anaheim and Huntington Beach, through a joint powers agreement, operate the Orange County-City Hazardous Materials Emergency Response Authority (OCCHMERA). OCCHMERA provides specialized hazardous materials emergency response services for Brea and several surrounding jurisdictions. The teams include certified hazardous materials specialists and operational first responders trained to manage spills, leaks, abandonment, and industrial process accidents as well as physical, chemical, biological, or radiological hazards (Anaheim 2025).

Future development accommodated under the Focused GPU would be required to maintain adequate emergency access during both construction and operation. All development would be required to go through the City's development review and permitting process and comply with all applicable design and safety standards and regulations in the California Building Code, California Fire Code, and BCC to ensure that project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

The Focused GPU includes updates to the Public Safety Element that updates and reinforces policies supporting safe evacuation and access for emergency vehicles and efficient and safe movement of people and goods during an emergency. Future development would be required to comply with these updated policies and all related City regulations.

Therefore, implementation of the Focused GPU would not impair implementation or physically interfere with an adopted emergency response or evacuation plans. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Under the BCSP, the Brea Fire Department would continue to provide emergency response services and implement fire prevention programs, and the Community Development Department would continue to implement the City's Emergency Preparedness Program. Development occurring under the BCSP would not interfere with the day-to-day operations of the Brea Fire Department, Community Development Department, or OCCHMERA, which jointly support hazardous materials and emergency response capabilities within the City.

All construction and operational activities under the BCSP would be required to follow applicable City and Brea Fire Department requirements, including emergency access standards, construction safety measures, and provisions for sufficient fire protection infrastructure. Development would also undergo the City's standard development review and permitting process to ensure adherence to the California Building Code and BCC.

With compliance with these established regulatory requirements and emergency access standards, development under the BCSP would not obstruct emergency response routes or conflict with emergency evacuation operations. Therefore, implementation of the BCSP would not impair or physically interfere with an adopted emergency response or evacuation plan. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.4.7 Threshold HAZ-g: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Impact Analysis

Focused General Plan Update

Portions of the City are in high and very high FHSZs in both Local and State Responsibility Areas. The northeastern tip of the plan area is within a moderate FHSZ and the rest of the area is outside a FHSZ. Impacts associated with wildland fires are discussed in detail in Section 4.16, Wildfire. As described therein, with the implementation of existing regulatory requirements (PPP PS-1 through PPP PS-6, and PPP T-1), implementation of the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the impact would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

There are no high or very high FHSZs in the BCSP area. Implementation of the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and the impact would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to hazards and hazardous materials that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.8.5.1 Cumulative Threshold HAZ-a: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Focused General Plan Update and Brea Core Specific Plan

Potential impacts associated with the release of hazardous materials are site-specific in nature and do not compound or increase in combination with impacts elsewhere. Asphalt, fuels, oils, paints, and solvents used during construction are not acutely hazardous, and use of these common hazardous materials in small quantities would not represent a significant hazard to the public or environment. Use and storage of cleaning supplies, motor oil, building maintenance supplies, paints and solvents, pesticides, or other similar materials during operation are not acutely hazardous, and the limited quantities and use of such products would not create a significant hazard to the public. Just as future development facilitated by the Project would be required to comply with Federal, State, and local regulations for transportation, use, handling, and disposal of hazardous materials, it is reasonable to assume that cumulative projects would be subject to the same or similar standards. Therefore, the transportation, use, handling, and disposal of potentially hazardous materials, substances, or waste would be addressed on a project-by-project basis, with each potential project complying with all regulatory requirements. The Proposed Project would not contribute to a cumulative impact related the transportation, use, handling, and disposal of hazardous materials.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5.2 Cumulative Threshold HAZ-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.

Focused General Plan Update and Brea Core Specific Plan

Cumulative impacts to release of potentially hazardous materials could occur if the Proposed Project, in combination with other cumulative projects, incrementally lead to 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. It is possible for projects throughout the City to occur near each other and simultaneously, which, for example, would lead to an increase in potential for hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste in an area with multiple ongoing construction projects. Just as future development facilitated by the Project would be required to comply with Federal, State, and local regulations for surveys, testing, remediation, and disposal, it is reasonable to assume that cumulative projects would be subject to the same or similar standards. Therefore, accidental releases of hazardous materials and disturbance of hazardous materials sites would be addressed on a project-by-project basis, with each potential project complying with all regulatory requirements. Future development would be required to comply with existing regulatory requirements, which would ensure projects would remediate existing hazardous contamination before construction can commence. Compliance with the CUPA for Orange County (PPP HAZ-3) would ensure that projects would identify and remediate hazardous materials listed on the EnviroStor and GeoTracker databases. Furthermore, compliance with the updated Public Safety Element would further support the City's goal of minimizing land use conflicts and hazards associated with hazardous materials, emergencies, and hazardous sites. Therefore, cumulative impacts to release of hazardous materials would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5.3 Cumulative Threshold HAZ-c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Focused General Plan Update and Brea Core Specific Plan

Cumulative impacts to the release of potentially hazardous materials could occur if the project, in combination with other cumulative projects, incrementally lead to improper use, handling, or transportation of potentially hazardous materials within 0.25 mile of an existing or proposed

school. It is possible for projects throughout the City to occur near each other and simultaneously, which, for example, would lead to an increase in potential for hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste in an area with multiple ongoing construction projects. Just as future development facilitated by the project would be required to comply with Federal, State, and local regulations for surveys, testing, remediation, and disposal, it is reasonable to assume that cumulative projects would be subject to the same or similar standards. Therefore, the use, handling, and transportation of potentially hazardous materials, substances, or waste would be addressed on a project-by-project basis, with each potential project complying with all regulatory requirements. Therefore, cumulative impacts related to improper use, handling, or transportation of potentially hazardous materials within 0.25 mile of an existing or proposed school would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5.4 Cumulative Threshold HAZ-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.

Focused General Plan Update and Brea Core Specific Plan

Cumulative impacts to release of potentially hazardous materials could occur if the Proposed Project, in combination with other cumulative projects, incrementally lead to a significant hazard to the public or the environment by locating multiple projects on hazardous materials sites. It is possible for projects throughout the City to occur near each other and on hazardous materials sites, which, for example, would lead to an increase in potential for release of hazardous materials from disturbance of hazardous sites. Just as future development facilitated by the Project would be required to comply with Federal, State, and local regulations for surveys, testing, remediation, and disposal, it is reasonable to assume that cumulative projects would be subject to the same or similar standards. Therefore, accidental releases of hazardous materials and disturbance of hazardous materials sites would be addressed on a project-by-project basis, with each potential project complying with all regulatory requirements. Future development would be required to comply with existing regulatory requirements, which would ensure projects would remediate existing hazardous contamination before construction can commence. Compliance with the CUPA for Orange County (PPP HAZ-3) would ensure that projects would identify and remediate hazardous materials listed on the EnviroStor and GeoTracker databases. Furthermore, compliance with the updated Public Safety Element would further support the City's goal of minimizing land use conflicts and hazards associated with hazardous sites. Therefore, cumulative impacts to disturbance of hazardous sites would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5.5 Cumulative Threshold HAZ-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, result in a safety hazard or excessive noise for people residing or working in the project area.

Focused General Plan Update and Brea Core Specific Plan

As previously described, the City is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, the Proposed Project would not contribute to a cumulative impact related to safety hazards or excessive noise for people residing or working on the project site.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5.6 Cumulative Threshold HAZ-f: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Focused General Plan Update and Brea Core Specific Plan

Future development would be located within existing developed areas and along major transportation corridors in the City that would allow for evacuation and response. Future development would also be designed consistent with all applicable safety requirements and would not physically interfere with any emergency response or evacuation plans, including the LHMP. As described in Section 4.8.4.5, Threshold HAZ-6, implementation of the Proposed Project would not interfere with implementation of an emergency response or evacuation plan. Therefore, the Project would not contribute to a cumulative impact related to emergency response or evacuation plans.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.5.7 Cumulative Threshold HAZ-g: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Focused General Plan Update and Brea Core Specific Plan

All new development and redevelopment located on land designated as State Responsibility Area, High and/or Very High FHSZ, or wildland-urban interface would be in compliance with the California Building Code, California Fire Code, California Wildland Urban Interface Code, and

BCC Chapter 15.08 (Building Code) and Chapter 16.04 (Fire Code). For example, development located on land designated as State Responsibility Area, High and/or Very High FHSZ, or wildland-urban interface would be required to maintain hazardous and vegetative fuel management in accordance with the California Fire Code and the Brea Fire Department Fuel Modification Guideline. Additionally, new buildings in the High and/or Very High FHSZ would require an automatic fire sprinkler system. Furthermore, compliance with the updated Public Safety chapter would further support the City's goal of minimizing exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, the Project would not contribute to a cumulative impact related to hazards and hazardous materials.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.8.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds HAZ-1 through HAZ-7 would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP HAZ-1 through PPP HAZ-9 and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.8.7 Mitigation Measures

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

4.8.8 Level of Significance After Mitigation

Not applicable.

4.9 Hydrology and Water Quality

This section evaluates the potential for impacts on hydrology and water quality resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

This section is based, in part, on the Drainage System Study for the BCSP prepared by Harris & Associates and included in Appendix L to this Program Environmental Impact Report (PEIR).

4.9.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to hydrology and water quality.

4.9.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address hydrology and water quality.

Federal

Clean Water Act

The Federal Water Pollution Control Act (or Clean Water Act [CWA]) is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the waters of the United States and gives the U.S. Environmental Protection Agency (USEPA) authority to implement pollution control programs, such as setting wastewater standards for industry. The statute's goal is to completely end all discharges and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates direct and indirect discharge of pollutants; sets water quality standards for all contaminants in surface waters; and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges; requires States to establish site-specific water quality standards for navigable bodies of water; and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA funds the construction of sewage treatment plants and recognizes the need for planning to address nonpoint sources of pollution. Section 402 of the CWA requires a permit for all point-source (a discernible, confined, and discrete conveyance, such as a pipe, ditch, or channel) discharges of any pollutant (except dredge or fill material) into waters of the United States.

Safe Drinking Water Act

The Federal Safe Drinking Water Act regulates drinking water quality nationwide and gives the USEPA the authority to set drinking water standards, such as the National Primary Drinking Water Regulations. These regulations protect drinking water by limiting the levels of contaminants that

can adversely affect public health. All public water systems that provide service to 25 or more individuals must meet these standards. Water purveyors must monitor for contaminants on fixed schedules and report to the USEPA when a maximum contaminant level (MCL) is exceeded. MCL is the maximum permissible level of a contaminant in water that is delivered to any user of a public water system. Contaminants include organic and inorganic chemicals (e.g., minerals), substances that are known to cause cancer, radionuclides (e.g., uranium and radon), and microbial contaminants (e.g., coliform and E. coli). The MCL list typically changes every 3 years as the USEPA adds new contaminants or revises MCLs. The California Safe Drinking Water Act is primarily regulated by the State Water Resources Control Board (SWRCB), specifically its Division of Drinking Water, which holds primary authority for enforcing both the State and Federal drinking water laws, overseeing public water systems, and setting standards for safe water.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States, including discharges from municipal separate storm sewer systems (MS4). Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Under the NPDES program, all facilities that discharge pollutants into waters of the United States are required to obtain an NPDES permit. Requirements for stormwater discharges are also regulated under this program. In California, the NPDES permit program is administered by the SWRCB through the nine Regional Water Quality Control Boards (RWQCBs). The City lies within the jurisdiction of the Santa Ana RWQCB (Region 8).

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) also administers the National Flood Insurance Program, which provides subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA issues flood insurance rate maps that provide flood information and identify flood hazard zones in the community. The design standard for flood protection established by FEMA is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

National Dam Safety Act of the Federal Emergency Management Agency

The National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. FEMA is the lead Federal

agency for the National Dam Safety Program and is responsible for coordinating efforts to secure the safety of dams across the country. This national program targets the improvement of dams and the safety of those who live in surrounding communities. Since it was first authorized by Congress in 1996, there have been marked improvements in the safety of many of the nation's dams. The program makes Federal funds available to the States, which are primarily responsible for protecting the public from failures of non-Federal dams and pursuing initiatives that enhance the safety of dams posing the greatest risk to people and property.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Water Code, Section 13000 et seq.) is the basic water quality control law for California. Under this act, the SWRCB has ultimate control over State water rights and water quality policy. In California, the USEPA has delegated authority to issue NPDES permits to the SWRCB. The State is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine RWQCBs, carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan, or Basin Plan, that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The City of Brea is in the Santa Ana River Basin, Region 8. The Basin Plan gives direction on the beneficial uses of the State waters within Region 8; describes the water quality that must be maintained to support such uses; and provides programs, projects, and other actions necessary to achieve the standards established in the Basin Plan. The Basin Plan establishes water quality standards for the ground and surface waters of the region. The term "water quality standards," as used in the Federal CWA, includes both the beneficial uses of specific waterbodies and the levels of quality, which must be met and maintained to protect those uses. The Basin Plan includes an implementation plan describing the actions by the regional board and others that are necessary to achieve and maintain the water quality standards. The regional board regulates waste discharges to minimize and control their effects on the quality of the region's ground and surface water.

Construction General Permit

Construction activities that disturb 1 or more acres of land must comply with the requirements of the SWRCB Construction General Permit (CGP)—2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ (adopted September 8, 2022). Under the terms of the permit, applicants must file Permit Registration Documents (PRD) with the SWRCB prior to the start of construction. The PRDs include a notice of intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement.

The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System website.

Applicants must demonstrate conformance with applicable best management practices (BMPs) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program for all risk levels and a stormwater sampling and analysis program for Risk Levels 2 and 3.

General Industrial Permit

The General Industrial Permit is an NPDES General Permit (Order No. 2014-0057-DWQ and amended by 2015-0122-DWQ) issued in compliance with Section 402 of the CWA. The permit took effect on July 1, 2015. The General Industrial Permit regulates operators of facilities that are subject to stormwater permitting and discharge stormwater associated with industrial activity.

Municipal Stormwater (MS4) Permit

The Proposed Project lies within the jurisdiction of the Santa Ana RWQCB (Region 8) and is subject to the waste discharge requirements of the North Orange County MS4 Permit (Order No. R8-2009-0030) and NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062. The County of Orange, incorporated Cities of Orange County, and the Orange County Flood Control District are co-permittees under the MS4 Permit. Pursuant to this permit, the co-permittees were required to develop and implement a drainage area management plan (DAMP) as well as local implementation plans, which describe urban runoff management programs for the local jurisdictions. The City of Brea, as a permittee under the General MS4 Permit, has legal authority for enforcing the terms of the permit in its jurisdiction.

The General MS4 Permit requires that new development or significant redevelopment projects use BMPs, including site design planning, source control, and treatment techniques, to ensure that the water quality of receiving waters is protected. These requirements are detailed in the Orange County Model Water Quality Management Plan (WQMP) and supplemental Technical Guidance Document, updated December 2013, which the City of Brea has incorporated into its project approval processes. In the Project area, any new development project or significant redevelopment project (i.e., adding 5,000 or more square feet of impervious surface) is required to prepare a WQMP that specifies the BMPs and low-impact development (LID) measures that would be implemented to minimize the effects of the project on regional hydrology, runoff flow rates and velocities, and pollutant loads. LID is a stormwater management strategy that emphasizes conservation and use of existing site features integrated with stormwater controls designed to

mimic natural hydrologic patterns, and that minimizes runoff by reducing the elements of development that produce it. An operations and maintenance plan must be included as part of the WQMP and designate terms, conditions, and requirements for maintaining the BMPs in perpetuity.

The County of Orange regulates storm runoff and water quality as the principal permittee under the General MS4 Permit and the DAMP. The City of Brea is a co-permittee under the General MS4 Permit and has legal authority for enforcing the terms of the permit in its jurisdiction.

The DAMP includes a New Development and Significant Redevelopment program. This program incorporates watershed protection and stormwater quality management principles into the General Plan process, environmental review process, and development permit approval process. The New Development and Significant Redevelopment program includes a model WQMP that defines requirements for project-specific planning, selection, and incorporation of BMPs into new development or redevelopment projects.

Stormwater Program: Trash Implementation Program

On April 7, 2015, the SWRCB adopted an amendment to the Water Quality Control Plan for Ocean Waters of California to Control Trash and to Part 1, Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California. They are collectively referred to as the "Trash Amendments." The Trash Amendments do the following: (1) establish a narrative water quality objective for trash, (2) corresponding applicability, (3) establish a prohibition on the discharge of trash, (4) provide implementation requirements for permitted stormwater and other discharges, (5) set a time schedule for compliance, and (6) provide a framework for monitoring and reporting requirements. Following adoption, the Trash Amendments were submitted to the California Office of Administrative Law and the USEPA for review and approval. The Office of Administrative Law approved the Trash Amendments on December 2, 2015. The USEPA approved the Trash Amendments on January 12, 2016.

The Trash Amendments apply to all Phase I and II permittees under the NPDES MS4 permits who retain regulatory authority over priority land uses. The SWRCB's executive director sent separate 13383 orders to traditional and nontraditional small MS4 permittees on June 1, 2017. RWQCBs, as the permitting authority, issued to their Phase I permittees either Water Code 13383 or 13267 orders that contain region-specific requirements, which may differ from the SWRCB's orders.

The Trash Amendments apply to all surface waters of the State and prohibit the discharge of trash to surface waters of the State or depositing trash where it could be discharged into surface waters of the State. Priority land uses are developed sites that include high density residential (10 or more dwelling units/acre); industrial; commercial; mixed urban; public transportation stations and stops; alternative areas determined by the permittees; and other areas determined by the State.

Senate Bill 92

On June 27, 2017, Governor Brown signed Senate Bill (SB) 92, which set new requirements for dam safety. As part of this legislation, dam owners must now submit inundation maps to the Department of Water Resources. After the maps are approved, the dam owner must submit an emergency action plan to the California Office of Emergency Services. The dam owner must submit updated plans and inundation maps every 10 years, or sooner under certain conditions. California Office of Emergency Services will review and approve the emergency action plans. This legislation added provisions for the emergency action plans, including compliance requirements, exercises of the plan, and coordination with local public safety agencies.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 was a comprehensive, three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. SGMA requires the formation of local groundwater sustainability agencies (GSA) to assess local water basin conditions and adopt locally based groundwater sustainability plans (GSP). SGMA gives GSAs 20 years to implement plans, achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. SGMA also provides local GSAs with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new sub-basins. Furthermore, under SGMA, GSAs responsible for high- and medium-priority basins must adopt GSPs within 5 to 7 years, depending on if the basin is in critical overdraft.

The City of Brea is located within the Department of Water Resources (DWR) designated medium-priority Coastal Plain of Orange County groundwater basin (Basin 8-1). SGMA permits agencies to prepare an "Alternative" to a GSP. In 2017, Orange County Water District (OCWD), Irvine Ranch Water District, and the City of La Habra jointly prepared the Basin 8-1 Alternative in compliance with SGMA (OCWD 2017). The Basin 8-1 Alternative presents an analysis of basin conditions that demonstrates that the basin has operated within its sustainable yield over a period of at least 10 years. In addition, the Basin 8-1 Alternative establishes objectives and criteria for management that would be addressed in a GSP and is designed to be "functionally equivalent" to a GSP. Other agencies, including the City of Brea, participated in the preparation of the Basin 8-1 Alternative.

Local

City of Brea Municipal Code Chapter 13.32: Storm Water Drainage

Chapter 13.32 of the Brea City Code (BCC) includes standards for protection of storm water quality, control of urban runoff, and inspections, enforcement, and permits associated with implementation of the code. BCC Section 13.32.030, Control of Urban Runoff, requires all new development and significant redevelopment to be undertaken in accordance with the DAMP (refer to MS4 Permit

above) and any reasonable conditions related to storm water runoff established by the City specific to the project and project site. Compliance with storm water runoff requirements is enforced through project review prior to issuance of construction or building permits and inspection by the City.

City of Brea Municipal Code – Flood Management

Chapter 20.276 of the BCC established a Flood Plain Overlay Zoning District to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas by creating legally enforceable regulations to be applied uniformly throughout the community to all publicly and privately owned land within flood-prone areas. No structure or land within the Flood Plain Overlay Zoning District may be constructed, located, extended, converted or altered without full compliance with the requirements of Division II, Floodplain Management of Title 18 of the BCC.

Division II, Floodplain Management of Title 18 includes regulations to:

A. Restrict or prohibit uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or flood heights or velocities;
B. Require that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction;
C. Control the alteration of natural floodplains, stream channels, and natural protective barriers, which help accommodate or channel floodwaters;
D. Control filling, grading, dredging, and other development which may increase flood damage; and
E. Prevent or regulate the construction of flood barriers which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

City of Brea Best Management Practices for Construction Activities

The City of Brea requires minimum water quality protection measures for all construction projects. These BMPs are required, at minimum, as notes or as an attachment for building and grading plans and apply to all permits. The minimum standard BMPs include erosion and sedimentation prevention; protection of stockpiled materials; proper storage and handling of potentially hazardous materials such as fuels, oils, and solvents; containment of non-stormwater runoff (e.g., equipment washing); proper trash and debris disposal; and slope stabilization. Approvals of construction permits require commitment from the project owner to comply with these requirements during construction.

Master Plan of Drainage

In 2013, the City of Brea finalized its Master Plan of Drainage. This document inventories existing drainage facilities, identifies deficiencies, and recommends improvements. The recommended

drainage improvements are ranked based on risk and have an associated estimated budget. The Master Plan of Drainage is used to informed Citywide drainage planning and capital improvements.

4.9.1.2 Existing Conditions

Focused General Plan Update Existing Conditions

Lower San Gabriel River/Coyote Creek Watershed

The Project area spans the Lower San Gabriel River/Coyote Creek Watershed as shown on Figure 4.9-1, Major Watersheds. The Lower San Gabriel River/Coyote Creek Watershed covers an area of approximately 85.5 square miles located within the northwest corner of Orange County. The watershed includes portions of the Cities of Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Placentia, and Seal Beach. The primary surface water body within the watershed is the Coyote Creek, which flows from Los Angeles County to the San Gabriel River (NOCIRWM 2018).

Drainage

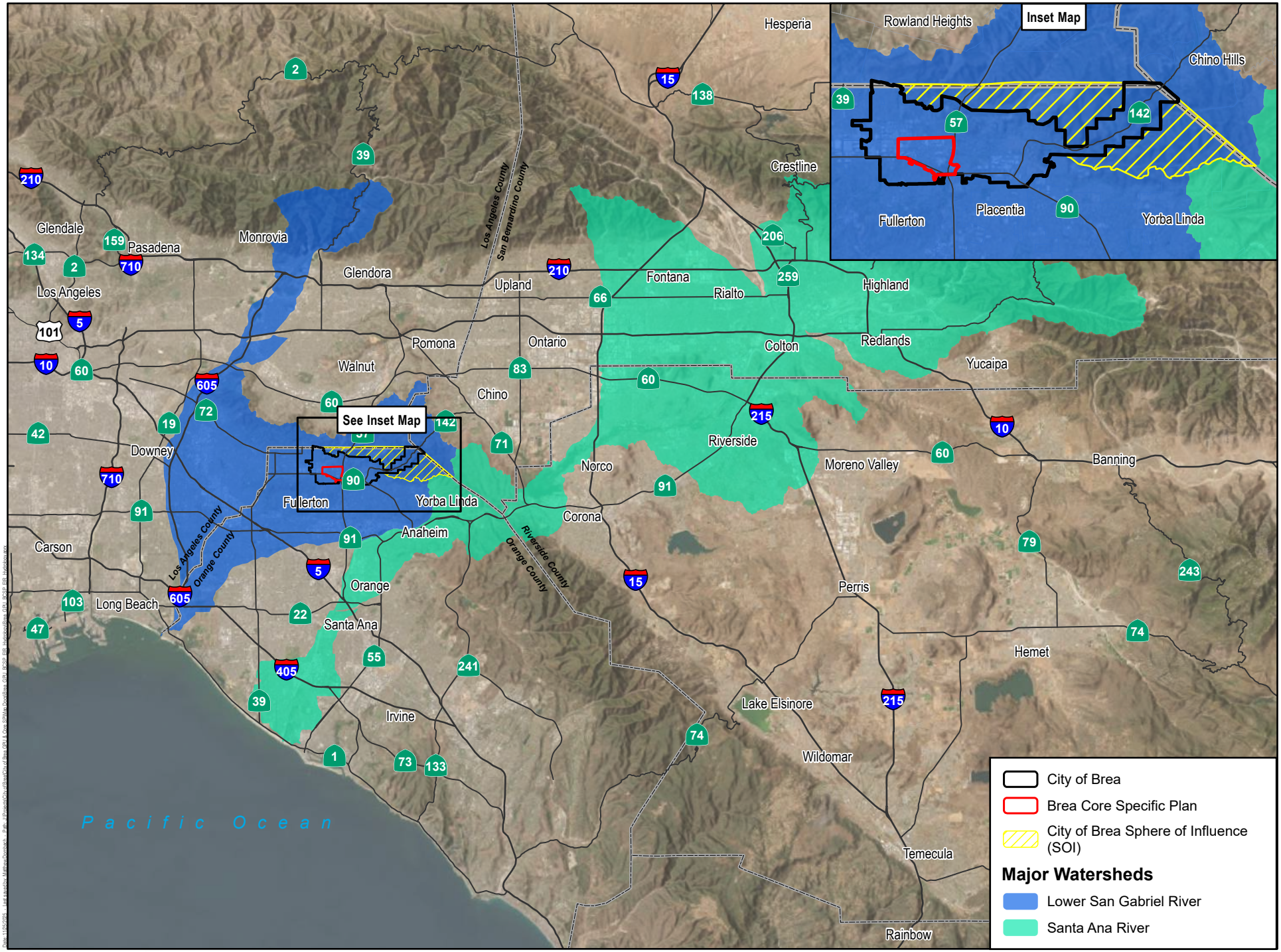
Elevations vary from approximately 282 feet above mean sea level to a maximum elevation of approximately 1,379 feet above mean sea level. The south and west areas of the City are generally flatter terrain with increasingly steeper hillside areas in the north and eastern areas. Stormwater runoff flows generally in a southwesterly direction through the City (City of Brea 2013).

Some of the storm water flowing through the City originates in the unincorporated Orange County area, within the City's Sphere of Influence, and within the County of Los Angeles to the north and the County of San Bernardino to the east. Storm runoff from these areas and the City flows into Orange County Flood Control District (OCFCD) facilities of Coyote Creek, Imperial Creek, Brea Creek, Fullerton Creek and Carbon Creek (City of Brea 2013). Refer to Figure 4.9-2, Major Drainage Areas.

The majority of existing storm drain improvements within the City were constructed between the years 1960 and 1990. As inventoried in the City's Master Plan of Drainage, the City's storm drain system encompasses approximately 53.5 miles of pipe and over 1,000 manholes/structures. Caltrans also maintains drainage facilities within its right-of-way within the City (City of Brea 2013).

Water Quality

As stated previously, the Project area is within the Santa Ana RWQCB, which implements the Basin Plan by establishing water quality standards and beneficial uses for the ground and surface waters of the region. Section 303(d) of the CWA authorizes the USEPA to assist States, territories, and authorized Tribes with listing impaired waters and developing total maximum daily loads (TMDL) for these water bodies. A TMDL establishes the maximum amount of a pollutant allowed in a water body and serves as the starting point or planning tool for restoring water quality. TMDLs are established in the Basin Plan.



Source: California Dept. of Fish and Wildlife, 2023; City of Brea, 2025; De Novo Planning Group, 2025; Maxar Imagery, 2024.

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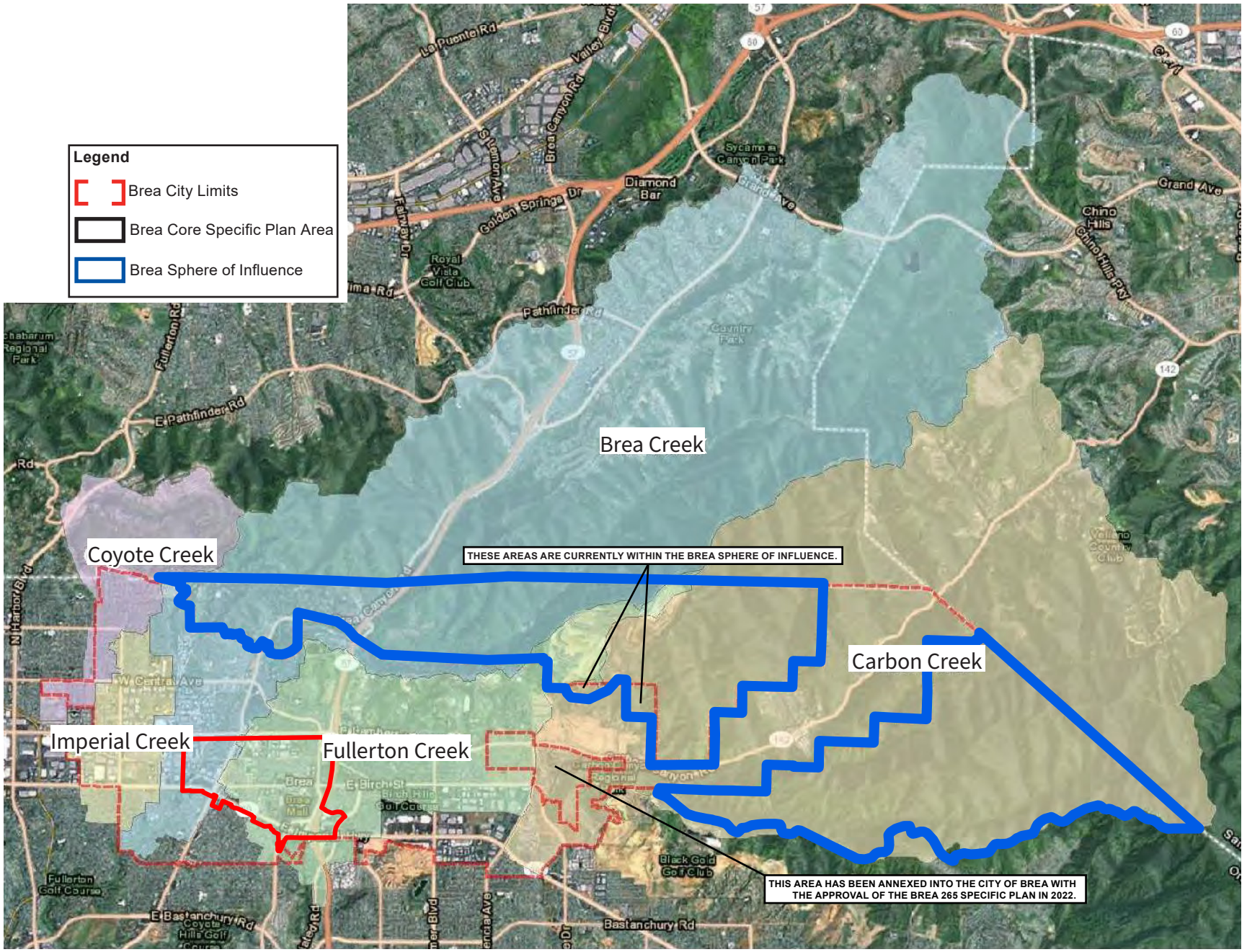
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Figure 4.9-1

Major Watersheds

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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Source: City of Brea, 2013.

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Figure 4.9-2

Major Drainage Areas

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There are no Section 303(d) listed impaired waters within the Project area. The nearest Section 303(d) listed impaired water body is Coyote Creek, with its nearest point located in the City of La Habra just south of the Project area's westernmost boundary. This listed reach of Coyote Creek is under the jurisdiction of the Los Angeles RWQCB and has the following listed pollutants: copper, iron, malathion, pH, toxicity, indicator bacteria, chlorine, and aluminum (SWRCB 2024).

Although not listed, the SWRCB identifies the following water bodies within the Project area: Brea Creek, Fullerton Creek, Loftus Diversion Channel, and Carbon Creek. Brea Creek, Fullerton Creek, and the Loftus Diversion Channel are considered "Category 3" water bodies, where beneficial uses may be potentially threatened, but sufficient information is not available; Carbon Creek is considered "Category 2" where there is insufficient information to assess the beneficial use of the water body (SWRCB 2024).

Groundwater Supply and Quality

The Project area is located within the 350 square mile Coastal Plain of Orange County groundwater basin and is considered a medium-priority basin by DWR (DWR 2025). As documented by the Basin 8-1 Alternative, Basin 8-1 is divided into four management areas. The Project area is located within the La Habra-Brea Management Area, which includes the northern portion of Basin 8-1 that is located outside the OCWD service area and is within the Cities of La Habra and Brea. The La Habra Groundwater Basin is shown on Figure 4.9-3, La Habra Groundwater Basin. The City of La Habra currently manages this portion of Basin 8-1. Although this management area is hydrologically distinct from the OCWD Management Area (which encompasses 89 percent of the Basin 8-1) there is an estimated 1,000 acre-feet per year of subsurface groundwater flow from the La Habra-Brea Management Area to the OCWD Management Area. Surface water that recharges the OCWD portion of Basin 8-1 does not replenish the La Habra-Brea Management Area (OCWD 2017).

The City of La Habra pumps local groundwater from the La Habra Groundwater Basin from three production wells: the Idaho Street Well, the La Bonita Well, and the Portola Well. The City of Brea owns and operates one non-potable groundwater well used for irrigation at Brea Creek Golf Course. The La Habra Groundwater Basin is currently monitored for groundwater elevations and for groundwater quality through productions wells and historical data from monitoring wells within the La Habra Groundwater Basin and surrounding area. The City of Brea's non-potable well is strictly used for irrigation purposes as the groundwater beneath the City has poor water quality and would require extensive treatment and blending with higher quality water to meet public health standards (OCWD 2017).

Flood, Seiche, and Tsunami Hazard

The FEMA 100-year flood hazard zones located within the Project area are shown on Figure 4.9-4, FEMA Flood Hazard Zones. The potential 100-year storm flooding is primarily

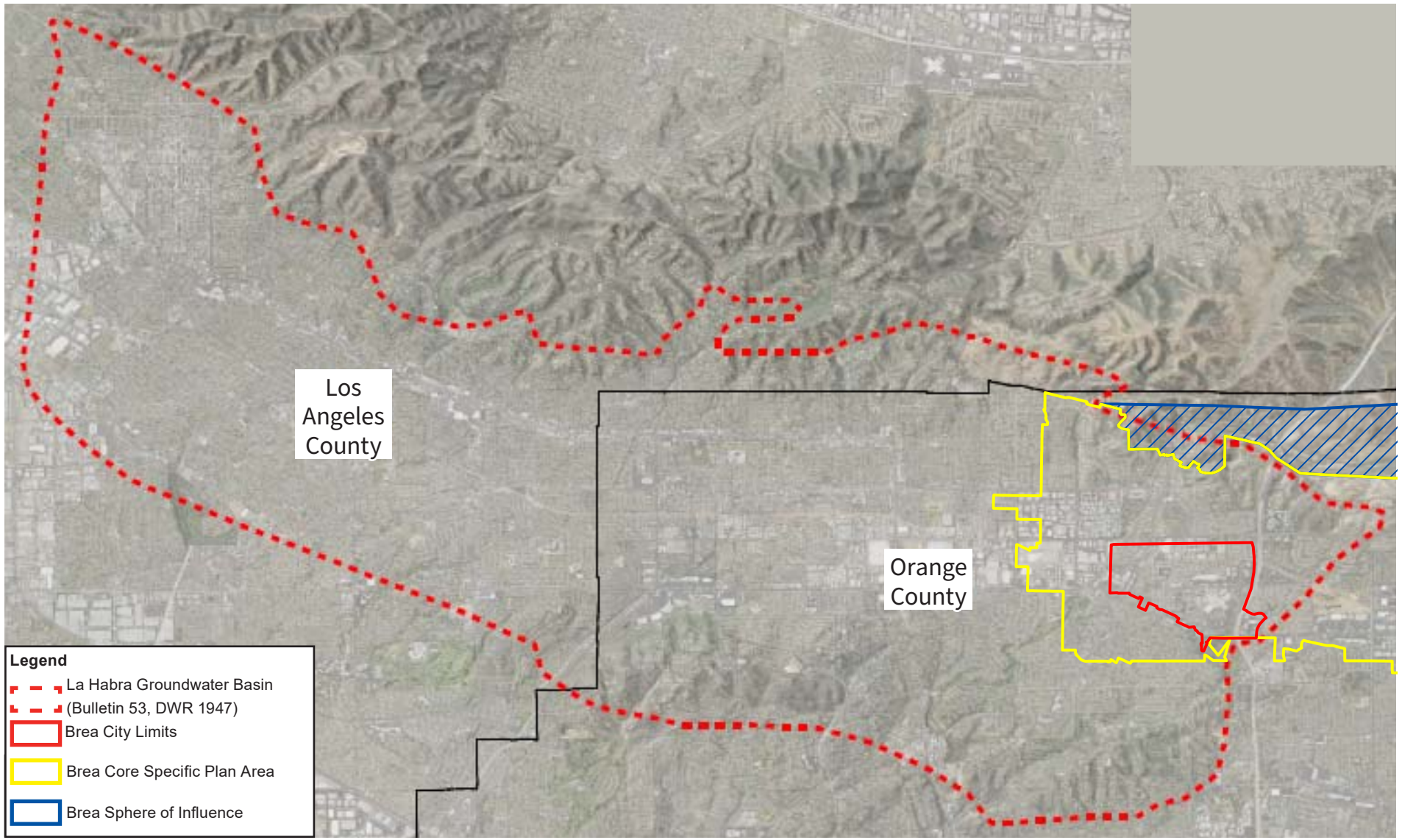
located upstream of Carbon Canyon Dam in open space areas, with other potential flood areas more limited to water bodies such as Fullerton Creek and Brea Creek.

Carbon Canyon Dam, located in the City of Brea within the Carbon Creek Watershed, was constructed in 1961 for flood control purposes and is owned by the U.S. Army Corps of Engineers and managed by Orange County (NOCIRWM 2018). Carbon Canyon Dam retains water over a 221-acre area and has a capacity of 7,033 acre-feet (City of Brea 2003). Orange County Reservoir, used for water storage, is owned by the Cities of Brea (40 percent), La Habra (20 percent), and Fullerton (40 percent), and is operated by the Metropolitan Water District. The reservoir covers 7 acres and has a capacity of 217 acre-feet (City of Brea 2003). The Orange County Reservoir dam is considered to be under the regulatory jurisdiction of DWR Division of Safety of Dams. Formal inundation mapping is not available for either dam through Division of Safety of Dams or U.S. Army Corps of Engineers; however, existing downstream land uses are largely residential. Figure 4.9-5, Dam Inundation, shows potential inundation areas from the City of Brea's Local Hazard Mitigation Plan.

Diemer No. 8 Dam is located within the County of Orange, south of the Project area. Diemer No. 8 Dam is owned and operated by the Metropolitan Water District of Southern California and falls under the regulatory jurisdiction of DWR DSOD. As shown on Figure 4.9-5, this dam has a relatively small mapping inundation area that is primarily located within Carbon Canyon Regional Park and open space areas.

A seiche is an oscillating surface wave generated by ground motion in a restricted or enclosed body of water, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Although there is no identified seiche zone within the Project area, several large surface water bodies exist that may produce a seiche. These include, but are not limited to, Carbon Canyon Dam and Orange County Reservoir.

The Project area is approximately 17 miles from the Pacific Ocean and would not be subject to tsunami inundation. Tsunami hazard is not discussed further in this section.



Source: California Dept. of Water Resources, 1934, 1939.

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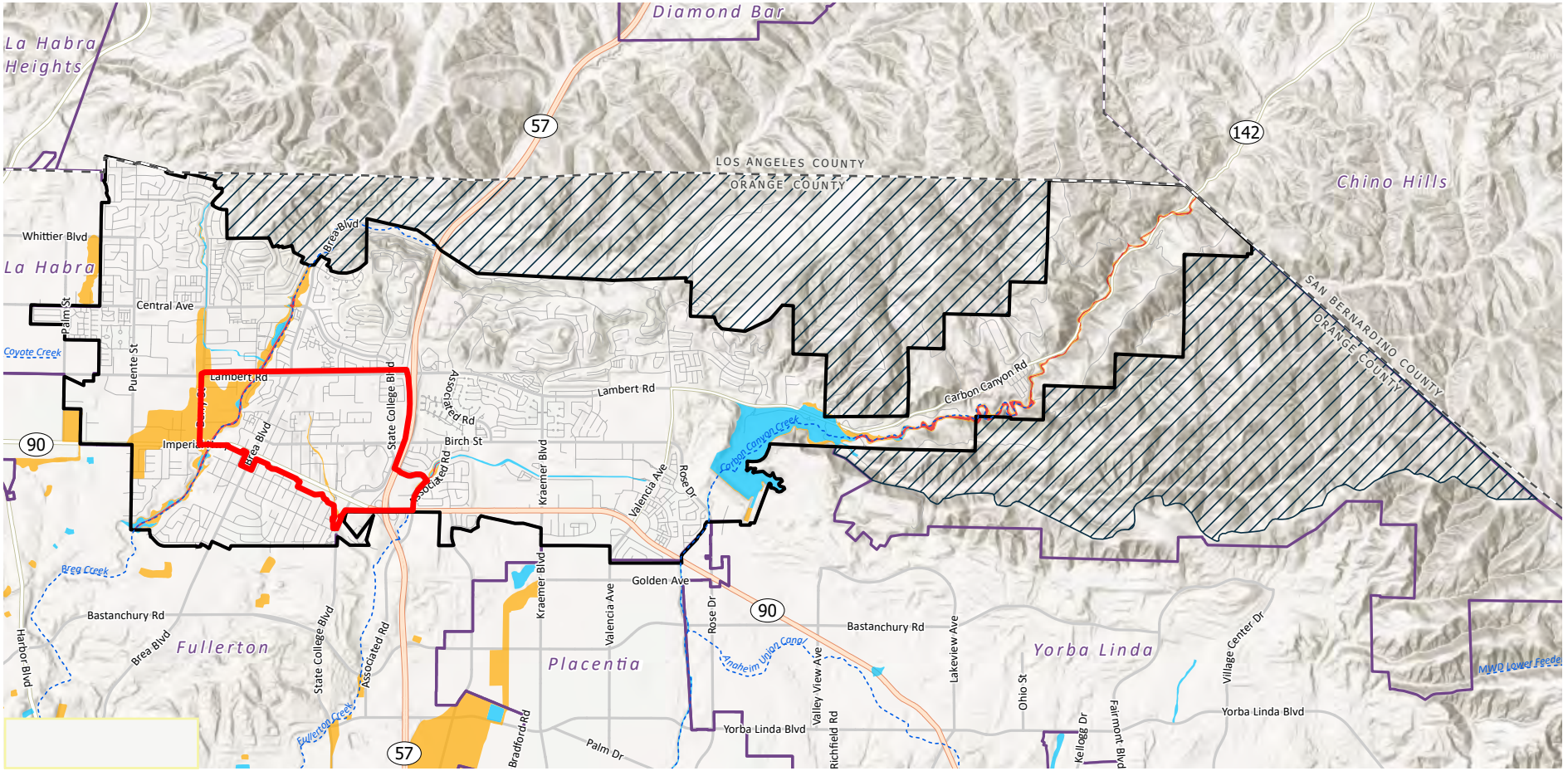
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Figure 4.9-3

La Habra Groundwater Basin

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LEGEND

- Brea City Boundary
- Brea Sphere of Influence
- Other Incorporated Area
- Brea Core Specific Plan Area
- County Boundary
- Major Rivers and Creeks

FEMA Designations within Orange County

- 100-year Flood Zone
- Regulatory Floodway
- 500-year Flood Zone
- unshaded — Area of Minimal Flood Hazard

Source: De Novo Planning Group, 2026.

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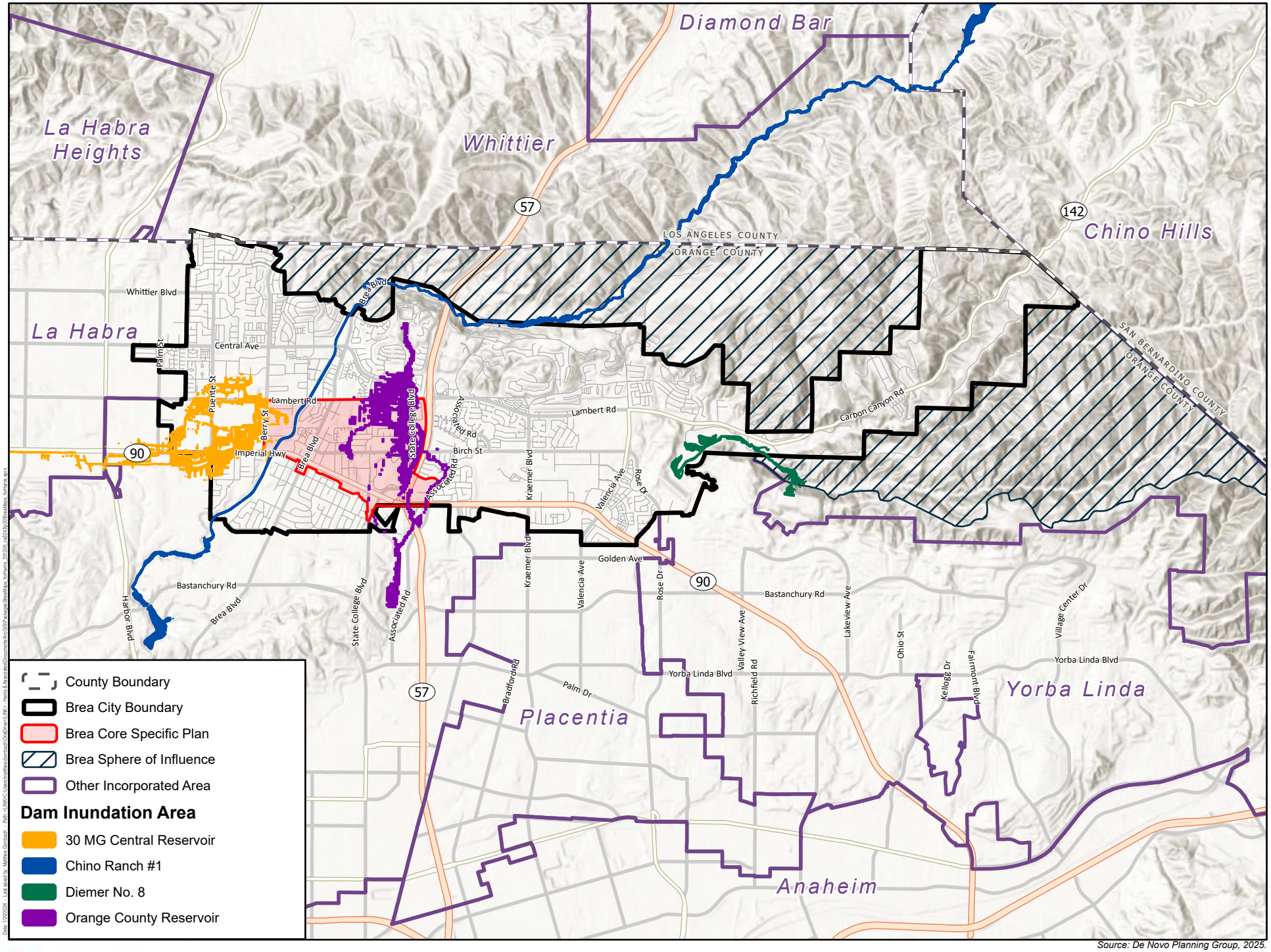
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Figure 4.9-4

FEMA Flood Hazard Zones

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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Source: De Novo Planning Group, 2025.

Harris & Associates

Figure 4.9-5
Dam Inundation

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Brea Core Specific Plan Existing Conditions

Watersheds

The BCSP area is located within Lower San Gabriel River/Coyote Creek Watershed as shown on Figure 4.9-1. The BCSP area is divided mostly between the regional watersheds of Brea Creek and Fullerton Creek, which flow in a southwesterly direction, as shown on Figure 4.9-6, Brea Core Specific Plan Area Watersheds and Drainage System. The areas west of North Brea Boulevard drain to OCFCD facilities associated with Brea Creek, and the areas to the east of North Brea Boulevard drain to Fullerton Creek OCFCD facilities. A small portion along the City's southern boundary, including part of the BCSP area, lies outside the major regional watershed and drains southward into the City of Fullerton's drainage system (Appendix L).

Drainage

The BCSP area is fully urbanized with an existing engineered storm water drainage system. The drainage system within the BCSP area consists of a network of City-owned pipes, manholes, and catch basins that drain into the OCFCD facilities of Brea Creek and Fullerton Creek or connects to the City of Fullerton drainage system (Figure 4.9-6).

Water Quality

Refer to the Water Quality discussion for the Focused GPU above.

Groundwater Supply and Quality

Refer to the Groundwater Supply and Quality discussion for the Focused GPU above.

Flood and Seiche Hazard

Most of the BCSP area does not lie within a FEMA Special Flood Hazard Area and is designated as Zone X. Areas designated as Zone X are identified as areas with minimal flood risk. There are two areas along the Brea Canyon Channel and Fullerton Creek that are designated as Zone AE and are subject to flooding by the 1 percent annual chance flood, as shown on Figure 4.9-7, FEMA Flood Hazard Zones in the Brea Core Specific Plan Area.

The BCSP area is located downstream of the Orange County Reservoir, within potential inundation areas, as shown on Figure 4.9-5.

No bodies of water capable of producing a seiche are located within or immediately adjacent to the BCSP area.

4.9.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have a significant impact on hydrology and water quality if it would:

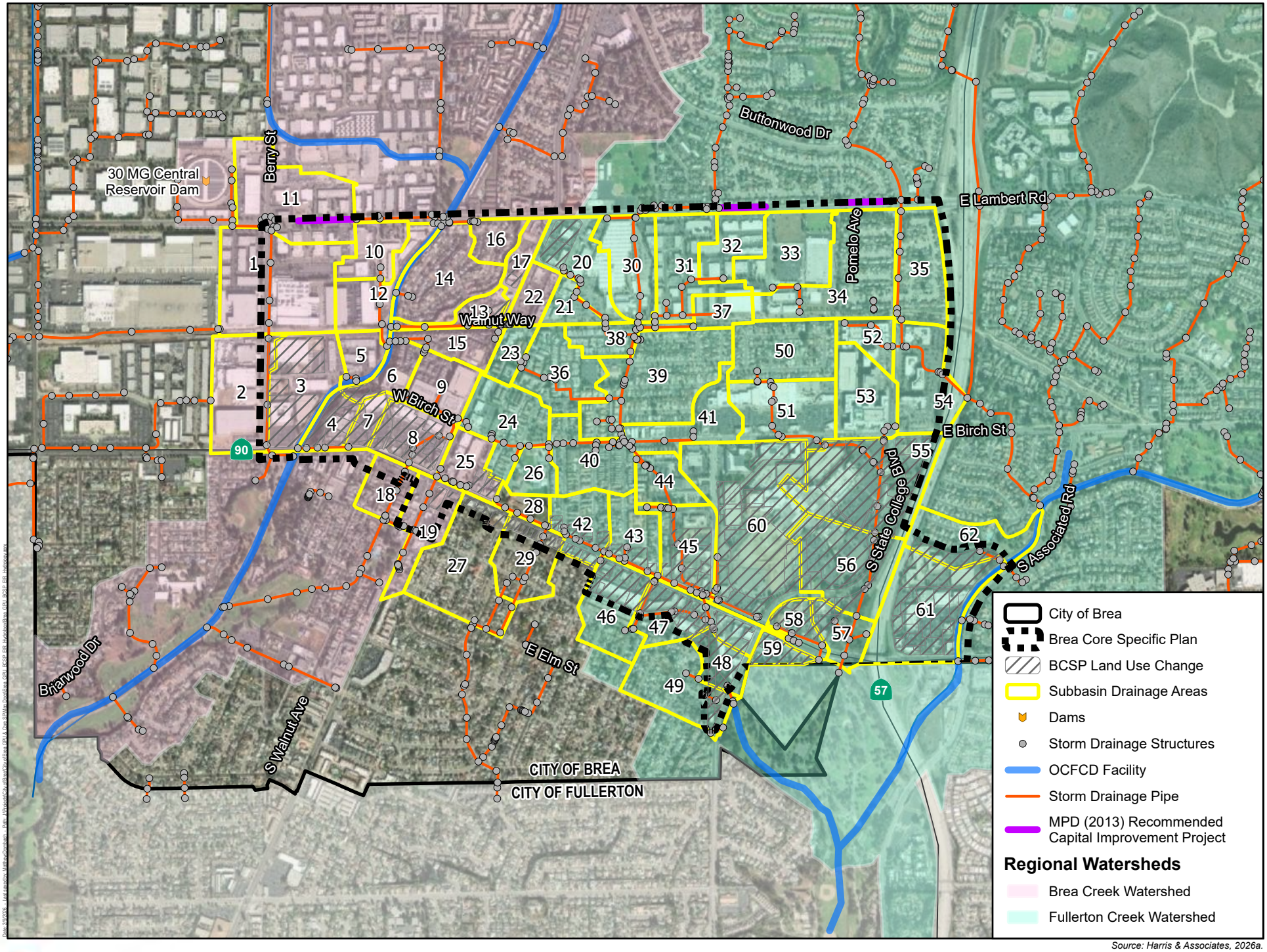
- **Threshold HYD-a:** Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- **Threshold HYD-b:** Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- **Threshold HYD-c:** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - Result in substantial erosion or siltation on- or off-site.
  - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
  - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
  - Impede or redirect flood flows.
- **Threshold HYD-d:** In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- **Threshold HYD-e:** Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. These measures are standard requirements; therefore, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Proposed Project and help reduce or avoid potential impacts related to hydrology and water quality:

PPP HYD-1 Compliance with the following State, regional, and local regulations concerning grading, stormwater, and water quality control will be required.

- National Pollutant Discharge Elimination System General Construction Permit. Notice of Intent and Storm Water Pollution Prevention Plan Requirements
- State Water Resources Control Board General Industrial Activities Storm Water Permit
- Santa Ana Regional Water Quality Control Board Waste Discharge Permits and Water Quality Certifications
- Orange County Municipal Separate Storm Sewer Systems Permit
- Orange County Model Water Quality Management Plan and Technical Guidance Document



Source: Harris & Associates, 2026a.

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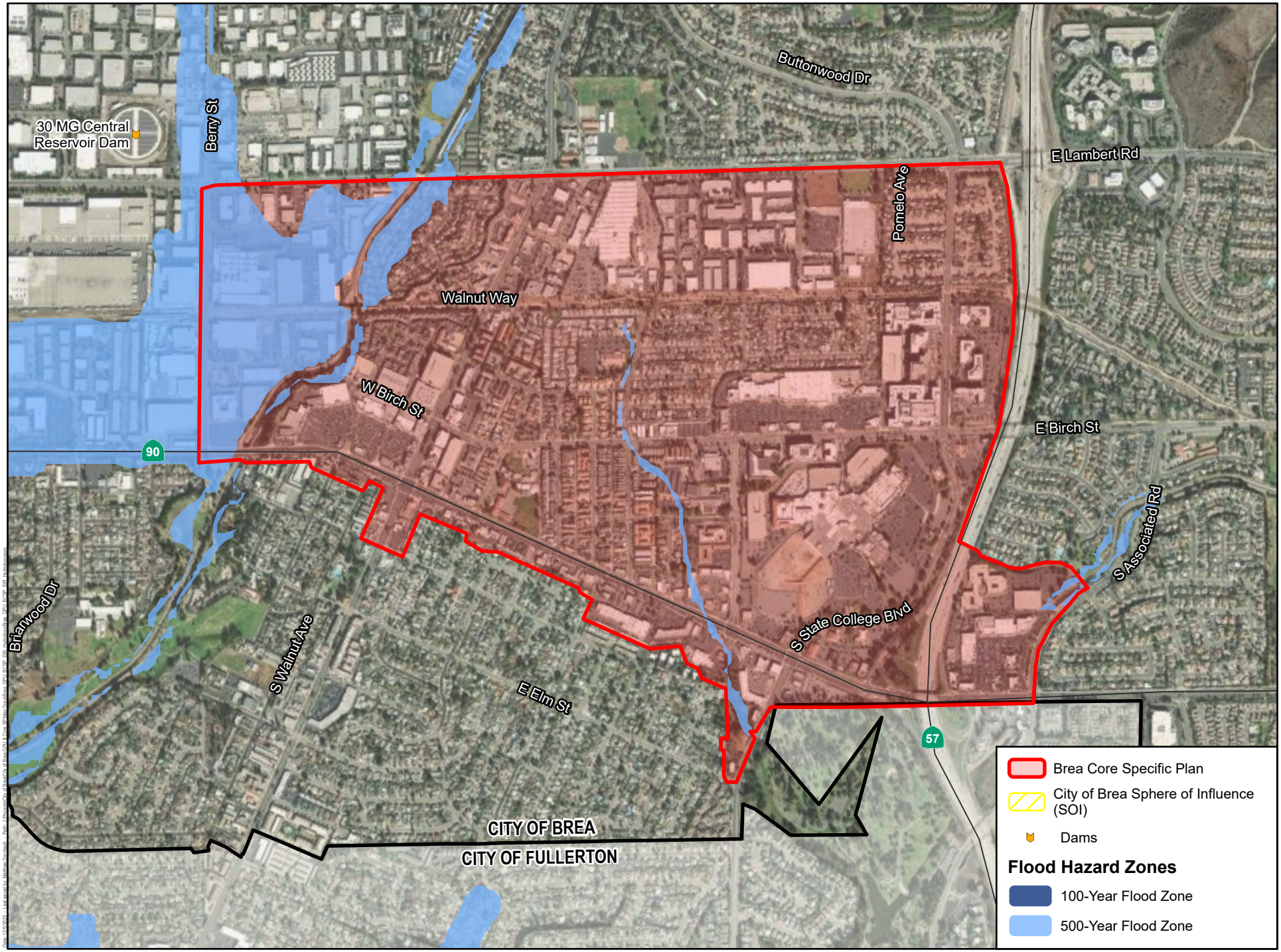
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Figure 4.9-6

Brea Core Specific Plan Area Watersheds and Drainage System

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Source: City of Brea, 2025; De Novo Planning Group, 2025; FEMA, 2025; Maxar Imagery, 2024.

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Figure 4.9-7

FEMA Flood Hazard Zones in the Brea Core Specific Plan Area

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- Orange County Drainage Area Management Plan - New Development/ Significant Redevelopment Program
- Orange County Hydrology Manual and 1996 Addendum
- Orange County Water District Groundwater Replenishment Program
- County of Orange/Orange County Flood Control District Local Implementation Plan 2019
- City of Brea Master Plan of Drainage

4.9.4 Environmental Impacts

The following sections address various potential impacts relating to hydrology and water quality that could result from implementation of the Proposed Project.

4.9.4.1 Threshold HYD-a: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Impact Analysis

Focused General Plan Update

Construction

Buildout of the Proposed Project would involve the construction of additional development residential and non-residential land uses throughout the Project area. Construction activities could increase soil erosion due to earthmoving activities such as excavation, grading, soil compaction and moving, and soil stockpiling, resulting in sediment transport in runoff. Earthmoving in soils, particularly near historical or ongoing heavy commercial uses may release existing contaminants such as nutrients, pesticides, commercial cleaning products, metals, and oils. Construction would also introduce typical pollutants (e.g., fuels, lubricants) and materials (e.g., metals, plastics, debris) that could enter the waterway. These pollutants have the potential to be transported downstream through erosion and overland flow, ultimately entering nearby waterways and contributing to degradation of surface and groundwater water quality.

Any development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres is subject to the NPDES Construction General Permit provisions. Compliance with the NPDES Construction General Permit would trigger preparation and compliance with an approved SWPPP that would consider the full range of erosion control BMPs, including any additional site-specific and seasonal conditions to minimize any water quality impacts that could result during construction.

In addition to the NPDES Construction General Permit, and for future development less than 1 acre in size, the City of Brea requires minimum water quality protection measures for all

construction projects. These BMPs are required, at minimum, as notes or as an attachment for building and grading plans and apply to all permits. The minimum standard BMPs include: erosion and sedimentation prevention; protection of stockpiled materials; proper storage and handling of potentially hazardous materials such as fuels, oils, and solvents; containment of non-stormwater runoff (e.g., equipment washing); proper trash and debris disposal; and slope stabilization. Approvals of construction permits require commitment from the project owner to comply with these requirements during construction.

All construction associated with buildout of the Focused GPU would comply with existing State and City regulations through the implementation of BMPs for stormwater pollution prevention. Construction activities would minimize pollutant discharge from construction activities to the extent feasible. Therefore, construction of the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality and impacts would be less than significant.

Post-Construction and Operation

The incorporated City of Brea is a largely developed suburban/urban community. The existing land use pattern is mixed and includes established residential neighborhoods, a concentrated downtown and mall/commercial core, industrial and business parks, civic and institutional uses, parks and open space, and transportation corridors. Most of the developed area is located west of Valencia Avenue, while the eastern portion consists primarily of residential neighborhoods, with large undeveloped foothills and canyons to the east and north. There is currently no development within the sphere of influence area, and only residential uses are permitted on approximately 34 percent of the total sphere of influence acreage under the current 2003 General Plan. The remaining 4,050 acres (66 percent) are designated for open space, parks/recreation, and public facilities, with no residential or non-residential development potential. Therefore, buildout of the Project area would largely come from redevelopment of already existing developed areas that contribute to urban storm water runoff.

Chapter 13.32 of the BCC includes standards for protection of storm water quality, control of urban runoff, and inspections, enforcement, and permits associated with implementation of the code. BCC Section 13.32.030, Control of Urban Runoff, requires all new development and significant redevelopment to be undertaken in accordance with the DAMP (refer to MS4 Permit above) and any reasonable conditions related to storm water runoff established by the City specific to a project and project site. Compliance with storm water runoff requirements is enforced through project review prior to issuance of construction or building permits and inspection by the City.

The General MS4 Permit requires that new development or significant redevelopment projects use BMPs, including site design planning, source control, and treatment techniques, to ensure that the water quality of receiving waters is protected. These requirements are detailed in the Orange County

Model WQMP and supplemental Technical Guidance Document, updated December 2013, which the City of Brea has incorporated into its project approval processes. In the Project area, any new development project or significant redevelopment project (i.e., adding 5,000 or more square feet of impervious surface) is required to prepare a WQMP that specifies the BMPs and LID measures that would be implemented to minimize the effects of the project on regional hydrology, runoff flow rates and velocities, and pollutant loads. LID is a stormwater management strategy that emphasizes conservation and use of existing site features integrated with stormwater controls designed to mimic natural hydrologic patterns, and that minimizes runoff by reducing the elements of development that produce it. An operations and maintenance plan must be included as part of the WQMP and designate terms, conditions, and requirements for maintaining the BMPs in perpetuity.

Redevelopment that occurs under buildout of the Focused GPU would result in well-designed site planning that meets current standards of practice and LID requirements for control of urban runoff, potentially improving discharged storm water quality from a given redevelopment site. Since the Proposed Project does not include specific or detailed development plans, project-specific stormwater management plans would not be required at this time. Future project-specific stormwater management plans, preliminary or final, would be prepared consistent with Chapter 13.32 of the BCC and DAMP. Site design BMPs include structural source controls for pollution prevention; increasing natural infiltration capacity; preserving existing drainage patterns; protecting existing vegetation; minimizing disconnecting impervious areas; and revegetate disturbed areas.

Buildout of the Focused GPU would be undertaken in compliance with Chapter 13.32 of the BCC and DAMP. Therefore, operation of the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The analysis above for the Focused GPU applies to the BCSP. Construction and operation of the BCSP would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.4.2 Threshold HYD-b: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact Analysis

Focused General Plan Update

The Project area is located within the 350 square mile Coastal Plain of Orange County groundwater basin (Basin 8-1) and is managed through implementation of the Basin 8-1 Alternative. The Project area is located within the La Habra-Brea Management Area. The City of La Habra currently manages this portion of Basin 8-1. The City of La Habra pumps local groundwater from the La Habra Groundwater Basin from three production wells. The City of Brea owns and operates one non-potable groundwater well used for irrigation at Brea Creek Golf Course. The City of Brea's non-potable well is strictly used for irrigation purposes as the groundwater beneath the City has poor water quality and would require extensive treatment and blending with higher quality water to meet public health standards (OCWD 2017).

The Basin 8-1 Alternative includes elements such as a sustainability goal, groundwater conditions, a water budget, and a description of projects or steps to achieve and maintain sustainability of the basin. The water budget is a modeled accounting of total surface water and groundwater entering and leaving the basin. As part of the Basin 8-1 Alternative implementation, the La Habra Groundwater Basin is currently monitored for groundwater elevations and for groundwater quality through productions wells and historical data from monitoring wells within the La Habra Groundwater Basin and surrounding area. Groundwater elevation of the basin has shown rising trends since the 1970s (OCWD 2017).

As described previously, the Project area is largely developed and buildout of the Project area would largely come from redevelopment of already existing developed areas (i.e., infill development). The western portion of the Project area (generally, west of S. Kraemer Boulevard) overlies the La Habra Groundwater Basin. Redevelopment of this area undertaken by future projects would result in minor changes in groundwater recharge and, depending on site-specific circumstances, could result in an increase in groundwater infiltration resulting from new landscaping and compliance with more stringent site design regulations, including Chapter 13.32 of the BCC and the DAMP. Additionally, construction of any given future project is not anticipated to use groundwater.

Therefore, construction and operation of the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

As shown on Figure 4.9-3, the BCSP area overlies the La Habra groundwater basin. The BCSP is fully developed with existing residential and commercial/industrial uses with associated large areas dedicated to surface parking. Redevelopment of the BCSP area undertaken by future projects would result in minor changes in groundwater recharge and, depending on site-specific circumstances, could result in an increase in groundwater infiltration resulting from new landscaping and compliance with more stringent site design regulations. For example, redevelopment of large commercial and light industrial areas would likely result in disconnection of existing impervious areas like parking lots, which would increase groundwater infiltration. For the same reasons discussed above for the Focused GPU, construction and operation of the BCSP would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.4.3 Threshold HYD-c: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and impede or redirect flood flow.

Impact Analysis

Focused General Plan Update

Erosion and Siltation

Construction activities associated with buildout of the Focused GPU would temporarily alter localized existing drainage patterns. As discussed under Threshold HYD-a, construction activities could increase soil erosion due to earthmoving activities such as excavation, grading, soil compaction and moving, and soil stockpiling, resulting in sediment transport in runoff. Any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres is subject to the NPDES Construction General Permit provisions requiring development and

implementation of a SWPPP with associated BMPs to control for erosion. In addition to the NPDES Construction General Permit, and for future development less than one acre in size, the City of Brea requires minimum water quality protection measures for all construction projects. These BMPs are required, at minimum, as notes or as an attachment for building and grading plans and apply to all permits. These include minimum standard BMPs for erosion and sedimentation prevention; protection of stockpiled materials; containment of non-stormwater runoff (e.g., equipment washing); and slope stabilization. Approvals of construction permits require commitment from the project owner to comply with these requirements during construction. Adherence to these regulations and standards would minimize the potential of erosion and siltation during construction facilitated by the Proposed Project and impacts would be less than significant.

Once construction is complete, exposed soils are typically stabilized with compaction, structural development, hardscape, and landscaping, thereby reducing the potential for erosion on-site. However, development and redevelopment could result in changes in drainage patterns and stormwater flows, such that erosion results in off-site areas. In the Project area, any new development project or significant redevelopment project is required to prepare a WQMP that specifies the BMPs and LID measures that would be implemented to minimize the effects of the project on regional hydrology, including runoff flow rates and velocities, and pollutant loads. LID is a stormwater management strategy that emphasizes conservation and use of existing site features integrated with stormwater controls designed to mimic natural hydrologic patterns, and that minimizes runoff by reducing the elements of development that produce it. Site design considerations include, but are not limited to, assessing existing topography, creating drainage management areas, accounting for existing drainage infrastructure, and retaining contiguous hydrologic features to the extent practicable. Therefore, mandatory compliance with stormwater flow controls during site design review of future development would minimize the potential to increase erosion and siltation on- and off-site. Impacts would be less than significant.

Stormwater Drainage and Localized Flooding

As described previously, the Project area is largely developed and buildout of the Project area would largely come from redevelopment of already existing developed areas (i.e., infill development). However, buildout would result in new development in previously undeveloped areas, primarily in the eastern portion of the City and its sphere of influence, which could result in an increase in storm water runoff quantities. Redevelopment would also alter existing drainage of any given infill site that would affect the existing storm water drainage system.

In the Project area, future projects would be required to prepare a WQMP that specifies the BMPs and LID measures that would be implemented to minimize the effects of the project on regional hydrology, including runoff flow rates and velocities. LID site design measures would require a future project to use existing site features integrated with stormwater controls designed to mimic natural hydrologic patterns, and that minimizes runoff. Redevelopment that occurs under buildout

of the Focused GPU would result in well-designed site planning that meets current standards of practice and LID requirements for control of urban runoff, potentially improving discharged storm water flows from a given redevelopment site. Since the Proposed Project does not include specific or detailed development plans, project-specific stormwater management plans would not be required at this time. Future project-specific stormwater management plans, preliminary or final, would be prepared, consistent with Chapter 13.32 of the BCC and DAMP.

Storm runoff from the City flows into OCFCD facilities of Coyote Creek, Imperial Creek, Brea Creek, Fullerton Creek and Carbon Creek. The majority of existing storm drain improvements within the City were constructed between the years 1960 and 1990. In 2013, the City of Brea finalized its Master Plan of Drainage, which inventories existing drainage facilities, identifies deficiencies, and recommends improvements. As the Proposed Project buildout progresses, the City would continue to maintain and improve its drainage infrastructure per the Master Plan of Drainage and its Capital Improvement Program for drainage facilities. Additionally, the City would continue to work with OCFCD for maintenance and long-term planning of regional drainage facilities that traverse and are downstream of the Project area.

Future development compliance with existing storm water management regulations and the continued master planning for the Citywide drainage system would ensure that buildout of the Project area would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, or exceed the capacity of the drainage system. Therefore, impacts would be less than significant.

Redirection of Flood Flows

Refer to discussion under Threshold HYD-d.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Erosion and Siltation

The analysis above for the Focused GPU applies to the BCSP. Construction and operation of the BCSP would result in similar potential to increase erosion and siltation. The BCSP is fully developed with existing residential and commercial/industrial uses. Redevelopment of the BCSP area undertaken by future projects would result in changes in erosion potential. Depending on site-specific circumstances, redevelopment could result in a decrease in erosion and siltation due to compliance with more stringent site design regulations. For example, redevelopment of large commercial and light industrial areas into mixed-use, which would likely result in the removal of large swathes of existing impervious areas like parking lots. Design review of all future development

within the BCSP would ensure compliance with existing storm water management regulations in place to address and minimize erosion potential. Therefore, mandatory compliance with stormwater flow controls during site design review of future development would minimize the potential to increase erosion and siltation on- and off-site. Impacts would be less than significant.

Stormwater Drainage and Localized Flooding

The following analysis is based on the Drainage System Study prepared for the BCSP and included as Appendix L to this PEIR. The Drainage System Study performed analysis consistent with the Orange County Hydrology Manual.

As described previously, the drainage system within the BCSP area consists of a network of City-owned pipes, manholes, and catch basins that drain into the OCFCD facilities of Brea Creek and Fullerton Creek or connects to the City of Fullerton drainage system. The Drainage System Study assessed peak runoff rates to the City's storm drainage system under the proposed BCSP land uses and compared the results with peak runoff rates under existing land uses. Runoff rates for the existing land uses were based on the analysis contained in the City's Master Plan of Drainage. The same methodology used in the City's Master Plan of Drainage was applied to the proposed land uses of the BCSP area to ensure consistency and to evaluate incremental changes resulting from the proposed land uses. These factors include rainfall intensity, soil loss rate, and assumed pervious area based on land use type. Finally, the drainage basin areas delineated in the City's Master Plan of Drainage were used to calculate peak runoff for the buildout of the proposed land uses. The overall drainage pattern of the BCSP and surrounding areas was assumed to remain the same as existing.

Overall, the Drainage System Study found that proposed land uses within the BCSP are anticipated to generate lower peak storm water runoff rates compared to the existing condition. Within the BCSP drainage area, certain storm drain segments were identified as operating under pressured conditions during a modeled 10-year storm event, however, these segments were not flooding. Given the anticipated reduction in peak runoff rates associated with the proposed land uses, these pressurized segments are not expected to experience increased flooding risk. Additionally, City's Master Plan of Drainage did find localized curb ponding along the north side of Lambert Road near the northern BCSP boundary and recommended drainage improvement projects in that vicinity. The recommended projects consist of new catch basins and piping at the ponding locations to collect runoff and convey it to the existing storm drain system.

Redevelopment that occurs under buildout of the BCSP would result in well-designed site planning that meets current standards of practice and LID requirements for control of urban runoff flows, potentially improving runoff rates from a given redevelopment site. Since the Proposed Project does not include specific or detailed development plans, project-specific stormwater management plans would not be required at this time. Future project-specific stormwater management plans, preliminary or final, would be prepared consistent with Chapter 13.32 of the BCC and DAMP.

Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, or exceed the capacity of the drainage system. Therefore, impacts would be less than significant.

Redirection of Flood Flows

Refer to Threshold HYD-d.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.4.4 Threshold HYD-d: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Impact Analysis

Focused General Plan Update

As shown on Figure 4.9-3, the majority of the Project area is not within a designated flood hazard zone. Areas with designated flood hazard zones are associated with Fullerton Creek, Brea Creek, and Carbon Canyon Dam. The 100-year flood hazard zones identified are generally limited to the channelized Fullerton and Brea Creeks, which are designed to accommodate large storm events to minimize risk of flooding to adjacent areas. Large areas along Brea Creek may be subject to the 500-year flood event (0.2 percent annual chance). For Carbon Canyon Dam, the potential 100-year storm flooding is primarily located upstream of the dam in open space areas. These areas are intended to flood in major storm events as Carbon Canyon Dam was constructed in 1961 for flood control purposes. All future development within an established Flood Plain Overlay Zoning District would be subject to full compliance with all standards of Title 18, Division II, Floodplain Management, of the BCC. Enforcement of floodplain management is achieved through the development review process as part of plan review and permit approval.

Potential dam inundation is shown on Figure 4.9-4. Breach of Carbon Canyon Dam presents the largest potential inundation area, encompassing a small portion of the Project area and neighboring jurisdictions to the south. Diemer No. 8 and the Orange County Reservoir also present inundation risk within the Project area. Diemer No. 8 would potentially inundate an open space area intended for floodway control. Carbon Canyon Dam and Orange County Reservoir inundation areas are all fully developed with existing residential and non-residential land uses. Redevelopment facilitated by the Focused GPU would be located in developed areas already subject to potential dam inundation. Future development would address dam inundation as part of the development review process to inform design as necessary to minimize adverse risk in the unlikely event of a dam breach.

There are several water bodies in the Project area that could generate seiches as the result of an earthquake or other disturbance; these include Carbon Canyon Dam and Orange County Reservoir. However, hazardous conditions related to a seiche within these waterbodies are unlikely given the small sizes of the waterbodies and lack of immediately adjacent proposed development. Additionally, there are not any formally defined seiche hazard zones within the City.

Therefore, impacts related to flood hazard or seiche zones would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Most of the BCSP area does not lie within a FEMA Special Flood Hazard Area and is designated as Zone X. Zone X are identified areas with minimal flood risk. There are two areas along the Brea Canyon Channel and Fullerton Creek that are designated as Zone AE and are subject to flooding by the 1 percent annual chance flood, as shown on Figure 4.9-6. All future development within an established Flood Hazard Overlay Zoning District would be subject to full compliance with all standards of Division II, Floodplain Management, of the BCC. Enforcement of floodplain management is achieved through the development review process as part of plan review and permit approval.

The BCSP area is located downstream of the Orange County Reservoir. Potential dam inundation is shown on Figure 4.9-4. The Orange County Reservoir presents an inundation risk within the BCSP area. The Orange County Reservoir inundation area is fully developed with existing residential and non-residential land uses. Redevelopment facilitated by the BCSP would be located in developed areas already subject to potential dam inundation. Future development would address dam inundation as part of the development review process to inform design as necessary to minimize adverse risk in the unlikely event of a dam breach.

No bodies of water capable of producing a seiche are located within or immediately adjacent to the BCSP area.

Therefore, impacts related to flood hazard or seiche zones would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.4.5 Threshold HYD-e: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact Analysis

Focused General Plan Update

Water Quality Control Plan

The Project area is subject to the Basin Plan for the Santa Ana River Basin implemented by the Santa Ana RWQCB. Within the Basin Plan are water quality objectives and standards, which must be maintained to allow for the continued beneficial uses of waters within the region. Future development undertaken through buildout of the Project area has the potential to introduce pollutants to receiving waters managed by the Basin Plan. Construction activities could increase soil erosion due to earthmoving activities and also introduce typical pollutants (e.g., fuels, lubricants) and materials (e.g., metals, plastics, debris). Post-construction, future development has the potential to affect water quality through the increase in impervious surfaces and through the use of commercially available products such as cleaning products, oil, gas, pesticides, fertilizers, sediment, and other debris. The Santa Ana RWQCB implements the Basin Plan by issuing and enforcing waste discharge permits. As described under Threshold HYD-a, construction and operation of future development within the Project area would comply with the NPDES Construction General Permit, Chapter 13.32 of the BCC, and DAMP. With implementation of these regulations during future project design, construction, and operation, the Proposed Project would not obstruct the Basin Plan. Impacts would be less than significant.

Sustainable Groundwater Management Plan

Refer to Threshold HYD-b. The Proposed Project would not conflict with the applicable sustainable groundwater management plan. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Water Quality Control Plan

The analysis above for the Focused GPU applies to the BCSP. As described under Threshold HYD-a, construction and operation of future development within the BCSP area would comply with the NPDES Construction General Permit, Chapter 13.32 of the BCC and DAMP. With implementation of these regulations during future project design, construction, and operation, the Proposed Project would not obstruct the Basin Plan. Impacts would be less than significant.

Sustainable Groundwater Management Plan

Refer to Threshold HYD-b. The Proposed Project would not conflict with the applicable sustainable groundwater management plan. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to hydrology and water quality that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.9.5.1 Cumulative Threshold HYD-a: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Focused General Plan Update and Brea Core Specific Plan

The cumulative study area for water quality is the part of Orange County in the jurisdiction of the Santa Ana RWQCB. Cumulative impacts to water quality standards could occur if the Proposed Project, in combination with other cumulative projects, incrementally lead to an increase in polluted discharge into water bodies throughout the Santa Ana River Basin. Cumulative development and redevelopment could lead to an increase in erosion potential in an area with multiple ongoing construction projects. Similarly, future development projects in conjunction with cumulative projects would lead to an overall increase in impervious surfaces and new land uses that contribute to changes in stormwater runoff flow and pollutant sources in an area. As with the Proposed Project, it is reasonable to assume all cumulative projects would comply with the NPDES Construction General Permit, its applicable MS4 permit, and local ordinances that pertain to grading, erosion control, and storm water runoff control. Therefore, water quality treatment of stormwater runoff would be addressed on a project-by-project basis, with each potential project complying with regional and local water quality requirements. Therefore, cumulative impacts to water quality standards would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.5.2 Cumulative Thresholds HYD-b and HYD-e: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; and Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Focused General Plan Update and Brea Core Specific Plan

As with the Proposed Project, it is reasonable to assume all cumulative projects would comply with the NPDES Construction General Permit, its applicable MS4 permit, and local ordinances that pertain to grading, erosion control, and storm water runoff control. Compliance with these regulations would incrementally achieve the water quality standards and objectives outlined in the Basin Plan. With implementation of these regulations during future project design, construction, and operation, cumulative impacts to the Basin Plan would be less than significant.

The Basin 8-1 Alternative spans the majority of the developed area of Orange County and is the only GSP or GSP Alternative required and adopted in the County. Other nearby basins identified by DWR include the Coastal Plain of Los Angeles – Central, San Juan Valley, and San Mateo Valley; each basin is considered "very low" priority and do not have a GSP. Basin 8-1 Alternative activities are regularly monitored and re-evaluated for changing conditions. Projects and actions implemented by the Basin 8-1 Alternative to achieve and maintain its sustainability goal are based on a wide variety of factors and are cumulative in nature. Each cumulative and future project would undergo site design and review to minimize adverse effects to infiltration and groundwater recharge, aiding in the effective sustainable management of the basin. Therefore, cumulative impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.5.3 Cumulative Threshold HYD-c and HYD-d: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and impede or redirect flood flow; and In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Focused General Plan Update and Brea Core Specific Plan

The geographic area considered for cumulative analysis is the San Gabriel River/Coyote Creek Watershed and the Santa Ana River Watershed, where the Project area drains. Cumulative projects, in combination with future development under the Focused GPU, would result in an incremental increase in impervious surfaces in areas that overlie groundwater basins, changes in localized drainage, and possible development within a floodway or floodplain zone. As with the Proposed Project, other cumulative projects would be required to implement site design, LID, and treatment control BMPs pursuant to their applicable MS4 permits and RWQCB and local code requirements. Jurisdictions in the watersheds regulate development within 100-year flood zones to minimize hazards to public safety and alterations of flood flows. With regard to the existing storm drain system, compliance with local, State, and Federal regulations to minimize stormwater runoff from individual projects would ensure that adequate storm drain infrastructure is constructed to serve existing and future developments. This would control post-development peak stormwater runoff flows and design with respect to potential flooding on a project-by-project basis. Therefore, cumulative impacts to site drainage, hydrology, and flooding would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.9.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds HYD-a through HYD-e would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP HYD-1 and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.9.7 Mitigation Measures

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

4.9.8 Level of Significance After Mitigation

Not applicable.

4.10 Land Use and Planning

This section evaluates the potential for impacts on land use and planning resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.10.1 Environmental Setting

The following sections describe the environmental setting for the Project as it relates to land use and planning.

4.10.1.1 Regulatory Setting

This section describes the federal, state, and local regulatory framework adopted to address land use and planning.

Federal

No federal regulations apply to land use and planning.

State

Senate Bill 375

Signed on September 30, 2008, Senate Bill 375 (SB 375) provides for a new planning process to coordinate land use planning and regional transportation plans and funding priorities to help California meet the greenhouse gas reduction goals established in Assembly Bill 32 (AB 32). SB 375 requires Metropolitan Planning Organizations (MPO), including Southern California Association of Governments (SCAG), to incorporate a Sustainable Communities Strategy (SCS) in their regional transportation plans that will achieve greenhouse gas emission reduction targets set by California Air Resources Board. There are two important facets to SB 375: reducing vehicle miles traveled and encouraging more compact, complete, and efficient communities for the future. SB 375 also includes provisions for exemptions from, or streamlined California Environmental Quality Act (CEQA) review for, projects classified as transit priority projects—projects that are consistent with SCS/Alternative Planning Strategy, at least 50 percent residential, minimum 20 dwelling units per acre, and within 0.5 mile of major transit stop or high quality transit corridor (CA Legislative Information 2024).

Senate Bill 375

State Planning and Zoning Law (California Government Code Section 65300) requires every city in California to adopt a comprehensive, long-term general plan for the physical development of the city. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a citywide vision. State

law requires that a general plan address eight required elements (land use, circulation, housing, conservation, open space, noise, safety, and environmental justice), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in state planning and zoning law should be examined to determine if there are environmental issues within the community that the general plan should address, including, but not limited to, hazards and flooding.

Additionally, on September 30, 2008, AB 1358, the California Complete Streets Act, was signed into law, becoming effective January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of the general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

Regional

Southern California Association of Governments (SCAG)

SCAG is a council of governments covering Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is the federally recognized MPO for this region, which encompasses over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and State law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives.

Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2024, SCAG adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal), which encompasses four principles—mobility, economy, healthy/complete communities, and environment—that are important to the region's future. This is an update to SCAG's 2020 RTP/SCS. Connect SoCal explicitly lays out goals related to housing, transportation technologies, equity, and resilience to adequately reflect the increasing importance of these topics in the region (SCAG 2025).

Master Plan of Arterial Highway

The Orange County Transportation Authority (OCTA) administers the Master Plan of Arterial Highways (MPAH), including the review and approval of amendments requested by local agencies. The MPAH is a countywide transportation plan for Orange County, designed to manage and improve the arterial highway network. Established in 1956, the MPAH was created to

complement the county's developing freeway system and has evolved into a critical element of Orange County's long-range transportation policy.

Over the years, the MPAH has played a crucial role in shaping the county's transportation infrastructure, ensuring a coordinated effort between OCTA and the cities within Orange County. The primary goal of the MPAH is to outline a regional arterial highway system that supports existing and future land uses, ensuring that roads are designed to accommodate projected traffic volumes. It aims to provide a circulation system that complements the County's freeway network, focusing on the efficient movement of people and goods (OCTA 2025).

Orange County Congestion Management Program

California Law (Proposition 111) requires each county to adopt a congestion management program that outlines how vehicular congestion issues will be addressed over a seven-year period. The program was adopted in July 1991 by the OCTA and is reviewed every two years.

Orange County General Plan

Approximately 6,232.9 acres of the Project area are located within unincorporated Orange County and outside the City of Brea's (City) incorporated limits. Land use and development within these areas are regulated by the Orange County General Plan, which establishes policies for land use, resource management, circulation, and public services under the Orange County's jurisdiction. Inclusion of the Orange County's planning framework also supports analysis of potential land use compatibility issues, regional coordination, and future annexation considerations within the City's Sphere of Influence (SOI).

Orange County Code

The Orange County Code establishes countywide regulations governing land use–adjacent functions, including flood control, waste management, environmental health, public safety, and infrastructure systems that extend across municipal boundaries. Although the City is a general law city with land use authority exercised pursuant to state law, the Orange County retains jurisdiction over certain regional facilities and unincorporated areas within and adjacent to Brea's SOI. Orange County ordinances also implement State mandates related to public health, hazard mitigation, and environmental protection that apply irrespective of city boundaries.

Local

City of Brea General Plan

The State of California mandates that every city adopt a comprehensive long-range plan that guides physical development and regulates land use. The 2003 Brea General Plan addresses the City's vision for and growth into the future. The 2003 Brea General Plan guides future decision making

about development, resource management, public safety, and community well-being. The 2003 Brea General Plan addresses lands within the City and within its SOI.

In 2003, the City adopted the 2003 Brea General Plan. The 2003 Brea General Plan comprises six chapters—Introduction, Community Development, Housing, Community Resources, Community Services, and Public Safety—that cover the required elements and additional topics of local relevance. Since 2003, the Housing chapter has been updated three times in compliance with California Housing Element law, with the most recent update adopted in August 2022 for the 6th Cycle Housing Element. No updates to the current Housing Element are expected to occur because of the Focused GPU or preparation of the BCSP. In addition, the Public Safety Element was last amended in 2021 in conjunction with the 6th Cycle Housing Element, and the land use designation map has been periodically amended to accommodate specific projects. At the time of its preparation, the 2003 Brea General Plan was based on forecasting and projections with a horizon year of 2020.

Brea City Code

The Brea City Code (BCC) contains the City's primary implementing regulations for land use, development standards, zoning, subdivision procedures, environmental protection, and public health and safety. The BCC serves as the legal mechanism for carrying out the goals and policies of the General Plan and provides detailed standards that guide the type, intensity, and character of development within the City. Key provisions regulate allowable land uses, building form and height, setbacks, parking, grading, and site development, as well as procedures for discretionary approvals and environmental review. Because the General Plan establishes the long-range framework, the BCC functions as a key implementing tool and is therefore an essential component of the regulatory setting for evaluating land use impacts.

The Brea Zoning Ordinance, BCC Title 20, is designed to encourage the most appropriate use of land and to facilitate adequate provision for community facilities and utilities. BCC Section 20.04.010 establishes zones for allowable uses. Zoning designations are identified for areas in the City and its SOI. See Figure 2-4, Current Zoning in the City of Brea, and Figure 2-6, Existing Zoning in the Brea Core Specific Plan Area, for the Project area's current zoning.

4.10.1.2 Existing Conditions

The Proposed Project encompasses the City and its SOI, collectively referred to as the Project area. The City is in the northeastern corner of Orange County, where the boundaries of Orange, Los Angeles, and San Bernardino Counties converge. The City is bordered by unincorporated Orange County land and the Los Angeles County line to the north; Chino Hills State Park and the San Bernardino County line to the east; the Cities of Yorba Linda, Placentia, and Fullerton to the south; and the City of La Habra to the west. The Orange Freeway (State Route [SR-] 57) bisects the City from north to south, along with Valencia Avenue (SR-142). The three major east–west roadways

are Imperial Highway (SR-90), Carbon Canyon Road (SR-142), and Lambert Road. The entire Project area encompasses 14,481.9 acres, with 8,249 acres within the incorporated limits of the City and 6,232.9 acres within the SOI.

The BCSP area totals approximately 778.97acres and is generally bound by Lambert Road to the north, Imperial Highway (SR-90) to the south, Berry Street to the west, and SR-57 and Associated Road to the east.

The incorporated City is a largely developed suburban/urban community located in northeast Orange County. The existing land use pattern is mixed and includes established residential neighborhoods, a concentrated downtown and mall/commercial core, industrial and business parks, civic and institutional uses, parks and open space, and transportation corridors. The existing General Plan land use designation categories are shown in Table 2-1, Existing and Adopted 2003 General Plan Land Use Summary, Chapter 2, Project Description, of this PEIR. Dominant categories are summarized below.

Residential: A range of single-family and multi-family neighborhoods occupy large portions of the City. Residential uses include older single-family subdivisions to the south and southeast, as well as higher-density multi-family housing concentrated near core commercial corridors and some recent infill project areas.

Commercial / Downtown / Retail Core: The Downtown/Civic Center area, retail corridors along Brea Boulevard and Birch Street, and the Brea Mall area represent the primary commercial and employment cores of the City. These areas contain a mix of retail, restaurants, offices, hotels, and civic uses.

Industrial / Business Parks: Industrial and business park land uses are concentrated in the northern and northwestern portions of the City and provide significant local employment.

Parks, Open Space & Recreation: The City maintains an interconnected system of parks, recreational facilities, and open spaces that serve neighborhood and regional needs.

Institutional & Public Facilities: Schools, municipal buildings, libraries, and other community facilities are distributed throughout the City, with focal concentrations in the downtown/civic area.

The incorporated City extends approximately eight miles east to west and about 3.5 miles north to south. Most of the developed areas are located west of Valencia Avenue, while the eastern portion consists primarily of residential neighborhoods, with large undeveloped foothills and canyons to the east and north.

4.10.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Proposed Project would have a significant impact on land use and planning if it would:

- **Threshold LU-a:** Physically divide an established community.
- **Threshold LU-b:** Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.10.3 Plans, Programs, and Policies

The new or updated General Plan goals and policies related to land use and planning are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the PEIR.

4.10.4 Environmental Impacts

The following sections address various potential impacts relating to land use and planning that could result from implementation of the Proposed Project.

4.10.4.1 Threshold LU-a: Physically divide an established community.

Impact Analysis

Focused General Plan Update

Division of an established community only occurs because of development and construction of physical features that constitute a barrier to easy and frequent travel between two or more constituent parts of a community.

As discussed in Chapter 2, Project Description, of this PEIR, the Project involves the adoption and implementation of the Focused GPU for the Brea planning area. The Focused GPU constitutes a comprehensive update to the City's existing 2003 Brea General Plan, ensuring its policies and programs align with current community needs, state mandates, and planning principles based on the General Plan Audit prepared in 2023. The Focused GPU includes comprehensive updates to all chapters of the 2003 Brea General Plan, which are now formally designated as “Elements.” The comprehensive list of the updated goals, policies, and implementation actions is provided in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions. Figure 2-7, Proposed General Plan Land Use Designations), illustrates the proposed General Plan planning land uses. Table 2-2, Proposed Land Use Summary, includes the existing conditions and the proposed Focused GPU land use summary. As detailed in Table 2-2, the Focused GPU would allow for additional housing units and non-residential square footage across various land use categories within the planning area.

Based on the proposed land use designations, density, and intensity, the proposed land use plan would provide for increased development over existing conditions by 7,391 housing units, 21,062

residents, 9,106,779 square feet of non-residential uses, and 21,772 jobs (refer to Table 2-2, Proposed Land Use Summary). Compared to the 2003 Brea General Plan, the proposed land use plan would allow an increase of 3,401 housing units, 9,693 residents, 2,110,285 square feet of non-residential uses, and 5,085 jobs (refer to Table 2-3, 2003 Brea General Plan and Proposed Land Use Change Summary).

The proposed land use and zoning changes would facilitate future redevelopment within already highly developed parts of the City. No aspect of the Proposed Project would physically divide an established community. The proposed Project includes provisions that would directly address land use connectivity, compatibility, and encroachment of new development on existing neighborhoods and land uses. Therefore, the Proposed Project would not result in an impact regarding the division of an established community.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

As with the Focused GPU, the proposed land use and zoning changes would facilitate future redevelopment within already highly developed parts of the City for the BCSP. No aspect of the BCSP would physically divide an established community. The BCSP includes provisions that would directly address land use connectivity, compatibility, and encroachment of new development on existing neighborhoods and land uses.

Based on the proposed land use designations, density, and intensity, the proposed land use plan would provide for increased development over existing conditions implementation of the BCSP would increase development within the BCSP area by 3,335 housing units, 9,502 residents, 1,265,725 square feet of non-residential development and 3,008 jobs. Therefore, the BCSP would not result in an impact regarding the division of an established community.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.10.4.2 Threshold LU-b: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

Impact Analysis

Focused General Plan Update

Conflicts between a project and applicable policies do not constitute significant physical environmental impacts in and of themselves. A policy inconsistency is considered a significant

adverse environmental impact only when it is related to a policy adopted for the purpose of avoiding or mitigating an environmental effect and it is anticipated that the inconsistency would result in a significant adverse physical impact based on the established significance criteria. As discussed below, adoption and development under the Proposed Project generally would not conflict with applicable land use policies adopted for the purpose of avoiding or mitigating an environmental effect.

SCAG Connect SoCal Consistency

The 2050 projections for the City in the SCAG Connect SoCal is 19,900 households and 57,400 jobs by 2050 (SCAG 2025). As shown in previous Table 2-2, Proposed Land Use Summary, the Focused GPU could accommodate up to 23,736 housing units and 73,709 jobs. Although the Proposed Project would exceed SCAG's growth projections, the Proposed Project is aligned with the regional projections identified in the 6th Regional Housing Needs Assessment (RHNA) Cycle. The Proposed Project would also be consistent with RTP/SCS and State goals through emphasis on design and reduction in vehicle miles traveled. A discussion of the Proposed Project's consistency with the goals of the RTP/SCS is provided in Table 4.10-1, Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals.

Table 4.10-1. Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals

Connect SoCal 2024–2050 RTP/SCS Goals	Connect SoCal 2024–2050 RTP/SCS Subgoals	Consistency
Mobility: Build and maintain an integrated multimodal transportation network.	Support investments that are well maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	Consistent. The Proposed Project includes updates to the General Plan Mobility Element, which includes updates to circulation-related policies. The Mobility Element supports the use of alternative modes of transportation, including walking, bicycling, and transit, to increase access opportunities and community connectivity. The updated Mobility Element includes policies which would support alternative modes of transportation and help the City adhere to the State's greenhouse gas emission reduction goals (see Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, of the Draft PEIR). The Proposed Project would not impede the City's ability to support investments that are well maintained and operated, coordinated, resilient, and result in improved safety, improved air quality, and minimized greenhouse gas emissions.
	Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	Consistent: The proposed Project would place a majority of growth in the City's downtown, Brea Core, portion of the City. The Brea Core is urbanized with planned or existing transit stations, commercial retail service areas, and active transportation corridors. Additionally, the Proposed Project includes Policy CD-6.5, Growth Pattern, to encourage infill development that reduces sprawl and preserves open space; Policy CD-6.7, Transportation Facilities, to assist in providing regional and local facilities; Policy CD-6.9, Alternative Modes of Travel, to promote expansion of non-vehicular transportation. The Proposed Project would provide a variety of readily available travel options.
	Support planning for people of all ages, abilities and backgrounds.	Consistent: The proposed Project would target community serving growth near planned or existing transit, commercial retail service areas, high-quality transit areas, and active transportation corridors.

Table 4.10-1. Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals

Connect SoCal 2024–2050 RTP/SCS Goals	Connect SoCal 2024–2050 RTP/SCS Subgoals	Consistency
Communities: Develop, connect, and sustain livable and thriving communities.	Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	Consistent. The Project would increase residential and mixed-use densities within major commercial corridors and centers and along high-quality transit corridors.
	Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	Consistent. The Project supports a variety of housing types, including low density, low-medium density, mid-density, and medium density development. Therefore, the Proposed Project would be consistent with this policy.
Environment: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.	Consistent. The Project includes Goal PS-5, Climate Resiliency, with policies and actions that focus on improving resiliency, efficiency, and sustainability, and minimizing contributions to climate change.
	Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	Consistent. The Proposed Project focuses new housing and commercial development in existing commercial corridors and centers, such as the Brea Core, and in proximity to transit; prioritizing local serving businesses; fostering land use development patterns and densities and streetscapes that promote a more active pedestrian environment; and improving the variety of travel choices for residents such as walking, biking, and public transit. The Proposed Project would contribute to denser communities in the City's downtown, improving active and public transit infrastructure, and reducing passenger vehicle trips, thereby also potentially reducing VMT and overall transportation fuel demands and mobile-source criteria air pollutant and greenhouse gas emissions.
	Conserve the region's resources	Not Applicable. The Proposed Project includes updates to the Community Development Element and Mobility Element, and zoning code and land use changes to ensure consistency with the 2021-2029 Housing Element. The Proposed Project also includes a Community Resources Element which provides goals and policies conserve the City's resources. The Proposed Project would not modify the City's adopted policies related to conserving resources within the City. The Project would not conflict with this policy.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	Improve access to jobs and educational resources.	Consistent. The Proposed Project would target community serving growth near commercial retail service areas, high-quality transit areas, and active transportation corridors. Additionally, the Project would increase mixed-use densities. This proposed land use development pattern and approach would contribute to increasing local employment opportunities.
	Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean	Consistent. The updated Mobility Element of the Focused GPU focuses on further development of a multimodal transportation network that would accommodate efficient automobile, public transit, and active transit movement. It emphasizes improving access to public transit and improving the active transit network in addition to improving overall street system safety. The updated Mobility Element includes Policy M-

Table 4.10-1. Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals

Connect SoCal 2024–2050 RTP/SCS Goals	Connect SoCal 2024–2050 RTP/SCS Subgoals	Consistency
	air and quality of life for our communities.	2.8, Truck Route Network, to maintain, and update as needed, a designated local truck route network that facilitates access to business and shopping centers while reducing commercial vehicle effects on the community.

City of Brea General Plan Consistency

As set forth by State law, the General Plan serves as the primary planning document for the City, and subordinate documents and plans would be updated to be consistent with the General Plan. Similar to the current 2003 General Plan, the Proposed Project focuses on the creating a community where new development blends with existing neighborhoods. The proposed Project carries forward and enhances policies and measures from the current General Plan that were intended for environmental protection and would not remove or conflict with City plans, policies, or regulations adopted for environmental protection. The Focused GPU includes comprehensive updates to the Community Development, Community Resources, and Public Safety Elements, and introduces two new Elements—Mobility and Economic Development— resulting in a total of five updated General Plan Elements as summarized previously in Chapter 2, Project Description, Section 2.4.1, Focused General Plan Update, of this PEIR. The goals and policies identified within Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, would help to mitigate or avoid environmental effects due to implementation of the proposed Project.

These modifications would not remove or adversely alter portions of the BCC that were adopted to mitigate an environmental effect. Subsequent development and infrastructure projects would be required to be consistent with all applicable policies, standards, and regulations, including land use plans, policies, and regulations adopted to mitigate environmental effects by the City, as well as those adopted by agencies with jurisdiction over components of future development project.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

SCAG Connect SoCal Consistency

The analysis above for the Focused GPU, including the consistency analysis provided in Table 4.10-1, Consistency with Applicable 2024–2050 SCAG RTP/SCS Goals, also applies to the BCSP. The BCSP focuses new housing and commercial development in existing commercial corridors and centers, such as the Brea Core, and in proximity to transit; prioritizing local serving businesses; fostering land use development patterns and densities and streetscapes that promote a more active

pedestrian environment; and improving the variety of travel choices for residents such as walking, biking, and public transit. Although the Proposed Project, which includes the growth within the BCSP area, would exceed SCAG's growth projections, the Proposed Project is aligned with the regional projections identified in the 6th RHNA Cycle. The BCSP would also be consistent with RTP/SCS and State goals through emphasis on design and reduction in vehicle miles traveled.

City of Brea General Plan Consistency

The new BCSP encompasses approximately 778.97 acres and has been prepared to implement the values identified in 2017 Brea Envisions Community Strategic Plan and the goals, policies, and recommendations of the 2020 Brea Connecting the Core Active Transportation Plan. The BCSP establishes land uses, as shown on Figure 2-8, Proposed Brea Core Specific Plan Area Zoning; provides mobility recommendations and streetscape improvements; proposes infrastructure upgrades to support new development; and outlines implementation strategies. This area is identified as the Specific Plan – Brea Core on Figure 2-7, Proposed General Plan Land Use Designations, which depicts the proposed Focused GPU land uses.

The BCSP would allow for the development of 4,752 residential units and approximately 6,379,588 square feet of non-residential uses within the plan area, representing an increase of 3,335 residential units and approximately 1,265,725 square feet of non-residential uses compared to existing conditions. As with the Focused GPU, these modifications would not remove or adversely alter portions of the BCC that were adopted to mitigate an environmental effect. Subsequent development and infrastructure projects would be required to be consistent with all applicable policies, standards, and regulations, including land use plans, policies, and regulations adopted to mitigate environmental effects by the City, as well as those adopted by agencies with jurisdiction over components of future development project.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.10.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to land use and planning that could result from implementation of the Proposed Project.

4.10.5.1 Cumulative Threshold LU-a: Physically divide an established community.

Focused General Plan Update and Brea Core Specific Plan

The land uses allowed under the Proposed Project provide opportunities for cohesive new growth at infill locations primarily along the City's major arterials and in the Brea Core area but would not create physical division in the community. The Proposed Project does not include any new

roadways, infrastructure, or other features that would divide existing communities. Each individual development project would be reviewed to determine its consistency and compatibility with the surrounding area and its potential to physically divide an established community. Because the Proposed Project would not physically divide an established community, it would not result in cumulatively considerable incremental effects.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.10.5.2 Cumulative Threshold LU-b: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Focused General Plan Update and Brea Core Specific Plan

The Proposed Project was prepared in conformance with State laws and regulations associated with the preparation of general plans, including requirements for environmental protection. The Project would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect. The Project carries forward and enhances policies and measures from the City's current General Plan that were intended for environmental protection and would not remove or conflict with City plans, policies, or regulations adopted for environmental protection. The Proposed Project does not include modifications that would remove or adversely alter portions of the BCC adopted to mitigate an environmental effect.

Similar to future development associated with the Project, cumulative development projects would be evaluated for consistency with each project site's applicable land use designation and zoning and other applicable plans for the purpose of avoiding or mitigating an environmental effect. As analyzed above, the Project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Thus, the Proposed Project's incremental effects would not be cumulatively considerable.

The cumulative study area for land use and planning considered the SCAG region and the City. Development of cumulative projects in the City would be required to mitigate land use impacts on a project-by-project basis. Each project would be evaluated for consistency with the project site's General Plan land use designation and zoning; adopted General Plan goals, polices, and actions; and other applicable regional land use plans, such as SCAG's 2050 Connect SoCal. As analyzed above, the Focused GPU would result in less than significant impacts related to land use and relevant planning. Therefore, the incremental impact of the Proposed Project, when considered in

combination with development within the City and SCAG region, would not result in cumulatively considerable land use impacts.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.10.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds LU-a and LU-b would be less than significant with compliance with applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.10.7 Mitigation Measures

No mitigation measures are required.

4.10.8 Level of Significance After Mitigation

Not applicable.

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4.11 Noise

This section evaluates the potential for impacts on noise resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.11.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to noise.

4.11.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address noise.

Federal

Federal Aviation Administration Standards (Code of Federal Regulations, Title 14, Part 150)

Enforced by the Federal Aviation Administration (FAA), Code of Federal Regulations, Title 14, Part 150, prescribes the procedures, standards, and methods governing the development, submission, and review of airport noise exposure maps and airport noise compatibility programs, including the process for evaluating and approving or disapproving those programs. The code also identifies those land uses that are normally compatible with various levels of exposure to noise by individuals. The FAA considers residential land uses compatible with exterior noise levels of 65 A-weighted decibel (dBA) day-night noise level (Ldn) or less.

Federal Transit Administration Standards

Although the Federal Transit Administration (FTA) standards are intended for Federally funded mass transit projects, the impact assessment procedures and criteria included in the FTA Transit Noise and Vibration Impact Assessment Manual (September 2018) are routinely used for projects proposed by local jurisdictions. The manual includes criteria for assessing the impacts of groundborne vibration, presented in Table 4.11-1, Federal Transit Administration Groundborne Vibration Impact Criteria.

Table 4.11-1. Federal Transit Administration Groundborne Vibration Impact Criteria

Land Use Category	Impact Levels (VdB)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses	75	78	83

Source: FTA 2018.

Notes: VdB = vibration decibel
Vibration levels are measured in or near the vibration-sensitive use.
[1] "Frequent Events" are defined as more than 70 vibration events of the same source per day.
[2] "Occasional Events" are defined as between 30 and 70 vibration events of the same source per day.
[3] "Infrequent Events" are defined as fewer than 30 vibration events of the same source per day.

Noise Control Act

The Noise Control Act of 1972 identifies uncontrolled noise as a danger to health and welfare, particularly for people in urban areas. Responsibility for noise control remains primarily a California and local issue. However, the Noise Control Act established a means for effective coordination of Federal research and noise-control activities (USEPA 2015). The Noise Control Act directs the U.S. Environmental Protection Agency (USEPA) to develop and publish information on noise levels to protect public health and welfare with an adequate margin of safety. In 1974, the USEPA published Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. The document identifies an interior noise level of 45 dBA Ldn in residential areas as adequate to protect indoor activity from interference and annoyance. An exterior noise level of 55 dBA Ldn was identified as the maximum noise level to avoid interference and annoyance in residential areas and other areas in which quiet is a basis for use. A maximum 24-hour average outdoor noise level of 70 dBA Leq is recommended to prevent hearing loss (USEPA 1974).

State

California Noise Control Act (California Health and Safety Code, Sections 46000– 46080)

California Health and Safety Code, Sections 46000–46080, known as the California Noise Control Act of 1973, find that excessive noise is a serious hazard to public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens through the control, prevention, and abatement of noise. It is the policy of California to provide an environment for all Californians free from noise that jeopardizes their health or welfare. Section 46050.1 mandates development guidelines for the preparation and content of General Plan Noise Elements.

The State of California 2017 General Plan Guidelines, published by the Governor's Office of Planning and Research (OPR) (as of July 1, 2024, named the Governor's Office of Land Use and Climate Innovation), provides guidance for the acceptability of specific land use types within areas of specific noise exposure. Appendix D, Noise Element Guidelines, of the OPR's General Plan Guidelines provides suggested land use compatibility guidelines that may be used by jurisdictions to develop local land use compatibility standards. The Noise Element Guidelines recognize that site-specific conditions make certain noise levels more or less acceptable than the mean response.

As such, the guidelines include correction factors to adjust measured noise exposure values to more accurately assess local sentiment toward acceptable noise exposure.

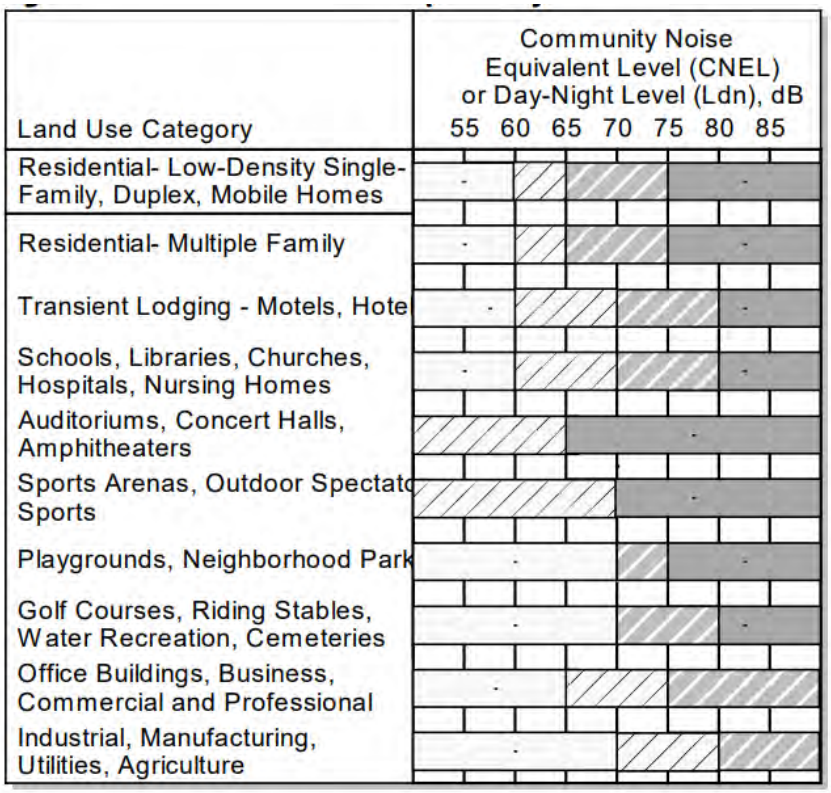
2003 Brea General Plan

The 2003 Brea General Plan Public Safety Element includes goals and policies to ensure public safety and protect the community from excessive noise levels. Existing goals and policies related to noise include the following:

- **Goal PS-9:** Minimize the impact of point source noise and ambient noise levels throughout the community.
  - **Policy PS-9.1:** Evaluate the need to require acoustical studies for development proposals that address both direct and indirect, particularly traffic, noise impacts, and require such studies, with appropriate mitigation included, as warranted.
  - **Policy PS-9.3:** Ensure that acceptable noise levels are maintained near schools, hospitals, convalescent homes, and other noise-sensitive areas in accordance with the Brea City Code and noise standards contained in the General Plan.
  - **Policy PS-9.5:** Avoid placing high-noise activity centers near residential areas.
- **Goal PS-10:** Minimize the impacts of transportation-related noise.
  - Policy PS-10.1: Reduce transportation noise by imposing traffic restrictions where necessary.
- **Goal PS-11:** Minimize noise impacts from sources other than transportation.
  - **Policy PS 11.1:** Require the inclusion of noise mitigation measures, techniques, and design features in the planning, design, and construction of future development and redevelopment projects.
  - **Policy PS-11.2:** Require that mixed-use structures be designed to prevent transfer of noise and vibration from commercial/retail to residential use
  - **Policy PS-11.3:** Minimize stationary noise sources and noise emanating from construction activities and special events.
  - **Policy PS-11.4:** Require that new non-residential development plan delivery areas away from existing residential areas.
  - **Policy PS-11.5:** Continue active enforcement to limit commercial and industrial delivery hours adjoining residential areas.

Table 4.11-2, Noise/Land Use Compatibility, presents the Noise Element Guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories in the City.

Table 4.11-2. Noise/Land Use Compatibility



Nature of the noise environment where the CNEL or Ldn level is:

Below 55 dB
Relatively quiet suburban urban areas, no arterial streets within 1 block, no freeways within 1/4 mile.

55-65 dB
Most somewhat noisy urban areas, near but no directly adjacent to high volumes of traffic.

65-75 dB
Very noisy urban areas n arterials, freeways or airports.

75+ dB
Extremely noisy urban areas adjacent to freewa or under airport traffic patterns. Hearing dama with constant exposure outdoors.

Normally Acceptable
Specified land use is satisfactory, based on the assumption that any buildings are of normal conventional construction, without any special noise insulation requirements

Conditionally Acceptable
New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Normally Unacceptable
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in design.

Clearly Unacceptable
New construction or development should generally not be undertaken.

The Community Noise Equivalent Level (CNEL) and Day-Night Noise Level (Ldn) are measures of noise environment. They represent the constant A-weighted noise level that would be measured if energy received over the day were averaged. In order to account for the greater sensitivity of peop night, the CNEL weighting includes a 5-decibel penalty on noise between 7:00 p.m. and 10:00 p.m 10-decibel penalty on noise between 10:00 p.m. and 7:00 a.m. of the next day. The Ldn includes 10-decibel weighting for late-night noise events. For practical purposes, the two measures are equ typical urban noise environments.

Brea City Code

Chapter 8.20, Noise Control, provides exterior standards for all Zone 1 (entire territory of the City of Brea) residential properties. Table 4.11-3, City of Brea Exterior Noise Standards, summarizes allowable noise levels at the receiving property lines of residences. Per Section 8.20.090, the noise standards also apply to schools, hospitals, and churches when in use.

Table 4.11-3. City of Brea Exterior Noise Standards

Zone 1	Time Period	Exterior Noise Level, dBA				
		L_{50}[1]	L_{25}[2]	L_{8}[3]	L_{2}[3]	L_{max}[5]
Residential Daytime	7:00 a.m.–10:00 p.m.	55	60	65	70	75
Residential Nighttime	10:00 p.m.–7:00 a.m.	50	55	60	65	70

Source: Brea City Code, Section 8.20.050, Exterior Noise Standards.

Notes: A 5 dBA penalty shall be applied in the event of an alleged offensive noise such as impact noise, simple tones, speech, music, or any combination thereof.

The standards are based on the following:

[1] The noise standard for a cumulative period of more than 30 minutes in any hour.

[2] The noise standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour.

[3] The noise standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour.

[4] The noise standard plus 15 dBA for a cumulative period of more than 1 minute in any hour.

[5] The noise standard plus 20 dBA for any period of time.

Under Brea City Code (BCC), Section 8.20.070, Special Provisions, the following are exempt from the provisions of the BCC:

- Activities conducted on the grounds of any public nursery, elementary, intermediate or secondary school or college.
- Any mechanical device, apparatus or equipment used, related to or connected with emergency machinery, vehicle or work.
- All mechanical devices, apparatus or equipment which are utilized for the protection or salvage of agricultural crops during periods of potential or actual frost damage or other adverse weather conditions.
- Noise associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a Federal holiday.
- Outdoor gatherings, public dances and shows, provided said events are conducted pursuant to a City permit.
- Activities conducted on any park or playground, provided such park or playground is owned and operated by a public entity.
- Noise sources associated with the maintenance of real property, provided the activities take place between 7:00 a.m. and 7:00 p.m.

- Mobile noise sources associated with agricultural operations; provided such operations do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a Federal holiday.
- Mobile noise sources associated with agricultural pest control through pesticide application, provided that the application is made in accordance with restricted material permits issued by or regulations enforced by the Agricultural Commissioner.

BCC Section 20.20.040, limits ground vibration to no more than 0.003 inch per second (in/sec). This criterion is equal to approximately 70 VdB (root-mean-square vibration decibel level).

4.11.1.2 Existing Conditions

Fundamentals of Environmental Noise

Quantification of Noise

The California Department of Transportation (Caltrans) defines noise as sound that is loud, unpleasant, unexpected, or undesired. Further, for the purposes of noise analysis, noise only exists if a source, path, and receiver are present. Sound pressure waves must be produced by a source and transmitted through a medium, such as air. The sound must be perceived by, registered by, or affect a receptor, such as an ear or noise monitoring device (Caltrans 2013a).

Sound pressure levels are quantified using a logarithmic ratio of actual sound pressures to a reference pressure squared, called bels. A bel is typically divided into tenths, or decibels (dB). Sound pressure alone is not a reliable indicator of loudness because frequency (or pitch) also affects how receptors respond to the sound. To account for the pitch of sounds and the corresponding sensitivity of human hearing to them, the raw sound pressure level is adjusted with a frequency-dependent A-weighting scale that is stated in units of decibels (dBA) (Caltrans 2013a). Typical A-weighted noise levels are listed in Table 4.11-4, Typical A-Weighted Noise Levels**.**

Table 4.11-4. Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	— 110 —	Rock band
Jet flyover at 1,000 feet		
	— 100 —	
Gas lawn mower at 3 feet		
	— 90 —	
Diesel truck at 50 feet at 50 miles per hour		Food blender at 3 feet
	— 80 —	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	— 70 —	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet

Table 4.11-4. Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Heavy traffic at 300 feet	— 60 —	
		Large business office
Quiet urban daytime	— 50 —	Dishwasher next room
Quiet urban nighttime	— 40 —	Theater, large conference room (background)
Quiet suburban nighttime		
	— 30 —	Library
Quiet rural nighttime		Bedroom at night
	— 20 —	
		Broadcast/recording studio
	— 10 —	
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Source: Caltrans 2013a.
Note: dBA = A-weighted decibel

A receptor's response to a given noise may vary depending on the sound level, duration of exposure, character of the noise sources, the time of day during which the noise is experienced, and the activity affected by the noise. Activities most affected by noise include rest, relaxation, recreation, study, and communication, such as quiet conversation or telephone calls. In consideration of these factors, different measures of noise exposure have been developed to quantify the extent of the effects from a variety of noise levels. For example, some measures consider the 24-hour noise environment of a location by using a weighted average that penalizes noise levels during normal relaxation and sleep hours. Other measures consider an average noise level over a period of time that includes ambient noise and a steady-state noise source for a given period of time within the averaging period (Caltrans 2013a). The indices for measuring community noise levels that are used in this report are defined below:

Leq, the equivalent energy level, provides an average acoustic or sound energy content of noise, measured during a prescribed period, such as 1 minute, 15 minutes, 1 hour, or 8 hours. The sound level may not be constant over the measured time period, but the average decibel sound level, given as dBA Leq, contains an equal amount of energy as the fluctuating sound level.

CNEL, the community noise equivalent level, is the average equivalent A-weighted sound level over a 24-hour period. This measurement applies weights to noise levels during evening and nighttime hours to compensate for the increased disturbance response of people at those times. CNEL is the equivalent sound level for a 24-hour period with a +5

dBA weighting applied to all sound occurring between 7:00 p.m. and 10:00 p.m. and a +10 dBA weighting applied to all sound occurring between 10:00 p.m. and 7:00 a.m.

Ldn, the day-night noise level, is a 24-hour Leq, except that the nighttime hours (10:00 p.m. to 7:00 a.m.) are assessed a 10 dBA penalty. This penalty attempts to account for the fact that nighttime noise levels are potentially more disturbing than equal daytime noise levels.

The decibel level of a sound decreases (or attenuates) as the distance from the source of that sound increases. For a single point source, such as a piece of mechanical equipment, the sound level normally decreases by approximately 6 dBA for each doubling of distance from the source. Sound that originates from a linear (or "line") source, such as vehicular traffic, attenuates by approximately 3 dBA per doubling of distance. Other contributing factors that affect sound reception include ground absorption, topography that provides a natural barrier, meteorological conditions, or the presence of human-made obstacles, such as buildings and sound barriers (Caltrans 2013a).

Noise Effects

Reaction to a given sound varies depending on acoustic characteristics of the source and the environment of the receptor. The A-scale de-emphasizes low-frequency sounds because humans are more sensitive to high-frequency sounds that are more likely to cause hearing damage. People tend to compare an intruding noise to existing background noise levels. If a new noise is considerably louder or noticeable above existing levels, it is generally considered objectionable. The activity that the receptor is engaged in also affects response. For example, the same noise source, such as constant freeway traffic, may be more objectionable to people sleeping than to workers in a factory. A 3 dBA change is the smallest increment that is perceptible by most receivers, and a 5 dBA change in community noise level is clearly noticeable. Generally, 1 to 2 dBA changes are not detectable except under controlled laboratory conditions. A sound that is 10 dBA greater than the reference sound is typically perceived as twice as loud (Caltrans 2013a).

Fundamentals of Environmental Vibration

Vibration is defined as the dynamic excitation of an elastic system, such as the ground or a structure, that results in oscillatory movement of the system (Caltrans 2013b). Typical human-made causes of earthborne vibration include trains and construction activities such as blasting, pile driving, and operation of heavy earthmoving equipment. The resulting waves transmitted through solid material are referred to as structureborne or groundborne vibration. Vibration energy spreads out as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. The vibration levels inside a building depend on the vibration energy that reaches the foundation and the characteristics of the structure that affect propagation of the vibration through it. A heavier building will typically experience lower vibration levels. The most common impact associated with vibration is annoyance resulting from the effects of vibration, such as building movement, rattling of windows, shaking of items on shelves or walls, and rumbling sounds. In more extreme cases,

building damage may occur. Because the effects of vibration elicit a greater response than the vibration itself, vibration is typically only perceptible to people inside buildings (FTA 2018).

Vibration levels are typically expressed in terms of the peak particle velocity (PPV) and root-mean-square (rms) amplitude, both in inches per second (in/sec). PPV is most appropriate for evaluating building damage potential. Caltrans estimates that continuous vibration levels of less than 0.08 PPV and single-event vibration levels of less than 0.12 PPV do not result in damage to even the most fragile historic buildings (Caltrans 2013b). The FTA has identified a maximum PPV of 0.2 in/sec for fragile buildings and 0.12 in/sec for extremely fragile historic buildings (FTA 2018).

PPV does not account for human response to vibration. The rms amplitude is used to represent average vibration amplitude, which accounts for the time it takes for the human body to respond to vibration signals. The rms amplitude is also given in decibel notation, referenced as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration relative to human response. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. Like airborne noise, groundborne noise is measured in dBA. The sound level accompanying vibration is generally 25 to 40 dBA lower than the vibration velocity level in VdB. Due to its low-frequency components, groundborne noise sounds louder than broadband noise with the same noise level. Typical vibration levels from various sources are shown in Table 4.11-5, Typical Levels of Groundborne Vibration. As shown in this table, the background vibration velocity level in residential areas is usually around 50 VdB, which is below the 65 VdB threshold of human perception (FTA 2018). The same human reaction corresponds to a given vibration velocity level and its resulting noise level; therefore, for simplicity, this analysis refers only to a source's VdB to describe potential human response to groundborne vibration and noise.

Table 4.11-5. Typical Levels of Groundborne Vibration

Vibration Level			
VdB[1]	in/sec RMS	Typical Sources (50 feet from source)	Human/Structural Response
100	0.01	Blasting from construction projects	Threshold, minor cosmetic damage to fragile buildings
90–100	0.003–0.01	Bulldozers and other heavy tracked construction equipment	Difficulty with tasks such as reading
80–90	0.001–0.003	Commuter rail and rapid transit, upper range	Residential annoyance, infrequent events (e.g., commuter rail)
70–80	0.0003–0.001	Typical commuter rail, bus, or truck over bump, typical rapid transit	Residential annoyance, frequent events (e.g., rapid transit)
60–70	0.0001–0.0003	Bus or truck, typical	Limit for vibration-sensitive equipment, approximate threshold for human perception
50	0.00003	Typical background vibration	Not detectable

Source: FTA 2018.

Notes: in/sec = inches per second; rms = root mean square; VdB = vibration decibel

[1] RMS vibration velocity level in VdB relative to 10–6 in/sec.

The general human response to different groundborne vibration velocity levels is described in Table 4.11-6, Human Response to Different Levels of Groundborne Vibration.

Table 4.11-6. Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Noise Level		Human Reaction
	Low Frequency	Mid Frequency	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many people. Mid-frequency sound may disturb sleep.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is annoying. Mid-frequency noise disturbs sleep and is considered annoying in quieter areas.
85 VdB	45 dBA	60 dBA	Vibration acceptable only if there are an infrequent number of events per day. Low-frequency noise disturbs sleep, and mid-frequency noise can be annoying to daytime noise-sensitive land uses (NSLUs), such as schools.

Source: FTA 2018.

Note: dBA = A-weighted decibel; NSLU = noise-sensitive land use; VdB = vibration decibel

Sensitive Receptors

The 2003 Brea General Plan defines noise-sensitive land uses (NSLUs) as schools, playgrounds, athletic facilities, hospitals, rest homes, residences, churches, and libraries.

Existing Noise Environment

Street and freeway traffic represent the primary noise sources in the City. Industrial and commercial activity presents concerns when adjacent to residential neighborhoods. In addition, mechanical equipment, playgrounds, leaf blowers, and construction equipment are examples of random noise sources that can contribute to neighborhood noise. The loudest noise levels occur along State Route 57, Imperial Highway (State Route 90), Brea Boulevard, and Valencia Avenue (State Route 142), where truck traffic associated with the Olinda Alpha landfill lumbers past homes and places of business. Lambert Road also experiences loud noise levels due to access to State Route 57. Properties directly adjacent to the freeway can experience decibels as high as 70 to 75 dBA. Sound attenuation walls, landscaped buffers, and dirt mounds all help to reduce the sound intensity of the freeway (City of Brea 2003).

4.11.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Project would have a significant impact on noise if it would result in:

- **Threshold NOI-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.

- **Threshold NOI-b:** Generation of excessive groundborne vibration or groundborne noise levels.
- **Threshold NOI-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, exposure of people residing or working in the Project area to excessive noise levels.

4.11.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and help reduce or avoid potential impacts related to noise:

PPP NOI-1 Residential development must comply with the California Building Code , Title 24, Part 2, Volume 1, Chapter 12, Interior Environment, Section 1207.11.2, Allowable Interior Noise Levels. Residential and non-residential development must comply with the City's land use compatibility limits as shown in Table 4.11-2, Noise/Land Use Compatibility. Before the issuance of a grading or construction permit for individual development projects that are not exempt from CEQA, and in conjunction with any required California Environmental Quality Act (CEQA) review, where development is proposed in an area where exterior noise would exceed the land use compatibility limits, the project applicants shall submit an Acoustical Study prepared by a certified acoustical engineer. Exterior noise may also be used to screen for potential interior noise impacts. The following screening levels may be applied to determine whether exterior noise would require preparation of an Acoustical Study:

- If existing roadways segments serving the project have an average daily traffic above 1,160, an Acoustical Study is required for new noise sensitive receptors.
- If existing roadways segments serving the project have an average daily traffic of 1,800 or higher, an Acoustical Study is required for commercial uses.

The project applicant shall include design measures that may include acoustical paneling or walls, compliance with CBC Section 1206 and/or CALGreen Section 5.507.4 as applicable to ensure that interior noise levels do not exceed 45 dBA CNEL for residential uses. If it is necessary for windows to be able to remain closed to ensure that interior noise levels meet the interior standard, the design for these land uses shall include ventilation with an air conditioning system to provide a habitable

interior environment with the windows closed. Final construction documents shall incorporate special design measures in the construction of the land uses.

PPP NOI-2 Nonresidential development must comply with the California Building Code, Title 24, Building Standards Administrative Code, Part 11, CALGreen.

PPP NOI-3 Development projects will be constructed in accordance with Brea City Code (BCC) Section 8.20, Noise Control, of the BCC, which generally prohibits construction, repair, remodeling, or grading of any real property between the hours of 7:00 pm and 7:00 am on weekdays, including Saturday, or at any time on Sunday or a Federal holiday.

PPP NOI-4 Project stationary sources will comply with the City of Brea's exterior noise standards in Brea City Code, Section 8.20.050 (refer to Table 4.11-3, City of Brea Exterior Noise Standards, of this Program Environmental Impact Report [PEIR]).

PPP NOI-5 Project vibration levels will comply with the City of Brea's vibration standard of 0.003 in/sec root-mean-square (equivalent to 70 VdB) in Brea City Code Section 20.20.040.

PPP NOI-6 Residential development in mixed-use zones must comply with the noise-related operational standards in Brea City Code, Section 20.258.030.H:

- Residents, whether owners or tenants, of a mixed-use development project shall be notified in writing before taking up residence that they will be living in an urban type of environment and that the noise levels may be higher than a typical residential area.
- The covenants, conditions, and restrictions of a mixed-use project shall require that the residents acknowledge their receipt of the written noise notification. Their signatures shall confirm receipt and understanding of this information.
- The location and design of recycling and refuse storage facilities shall mitigate nuisances when residential uses might be impacted.
- Residential dwelling units shall be designed to be sound attenuated against present and future project noise. New projects or new nonresidential uses in existing projects shall provide an acoustical analysis report, by an acoustical engineer, describing the acoustical design features of the structure required to satisfy the exterior and interior noise standards.

The new or updated general plan goals and policies related to noise are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to this PEIR.

4.11.4 Environmental Impacts

The following sections address various potential impacts relating to noise that could result from implementation of the Proposed Project.

4.11.4.1 Threshold NOI-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.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

Potential impacts related to excessive noise levels from construction and operation of future development proposed through implementation of the Focused GPU and BCSP are discussed below.

Construction Noise

Construction noise associated with future development under the Focused GPU and BCSP would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for on-site construction activities and construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction phase, distance between the noise source and receiver, and intervening structures. As shown in Table 4.11-7, Typical Noise Levels for Construction Equipment, sound levels from typical construction equipment range from 74 to 85 dBA Leq at 50 feet from the source (FHWA 2008). Noise from construction equipment generally exhibits point source acoustical characteristics. As defined previously, a point source sound decays at a rate of 6 dBA per doubling of distance from the source.

Table 4.11-7. Typical Noise Levels for Construction Equipment

Construction Equipment	Typical Noise Level at 50 Feet (dBA)
Air Compressor	77.7
Backhoe	77.6
Concrete Mixer Truck	78.8
Crane	80.6
Dozer	81.7
Dump Truck	76.5
Excavator	80.7
Generator	80.6
Grader	85

Table 4.11-7. Typical Noise Levels for Construction Equipment

Construction Equipment	Typical Noise Level at 50 Feet (dBA)
Loader	79.1
Paver	77.2
Roller	80
Scraper	83.6
Tractor	84
Welder	74

Source: FHWA 2008.
Notes: dBA = A-weighted decibel

The Focused GPU is a policy plan, and no specific development is proposed at this time; thus, construction phasing and equipment parameters are not available for future development. However, typical construction activities that would be anticipated to occur in association with the development of future land uses and infrastructure would include grading and site preparation; utilities installation; surface improvements, including paving and landscaping; building construction; and external/internal building work. Construction of any off-site improvements could require vegetation clearing, underground utility installation, and paving. Standard equipment commonly used for construction projects include dozers, loaders, graders, backhoes, scrapers, and miscellaneous trucks. As stated previously, sound levels from typical construction equipment have the potential to reach 90 dBA Leq.

The Brea Noise Control Ordinance (refer to Section 4.11.1.1) establishes construction time-of-day restrictions. The ordinance limits construction activities to Monday through Saturday between 7:00 a.m. and 7:00 p.m., excluding Federal holidays. However, the City does not have an established noise threshold for construction noise. The FTA provides criteria for acceptable construction noise levels and recommends a daytime noise threshold of 80 dBA Leq.

Construction from development of land uses accommodated by the Proposed Project would be subject to the Brea Noise Control Ordinance limits, which restrict the hours of construction activity. However, because specific Project-level information is not yet available, it is not possible to quantify the estimated construction noise levels at specific sensitive receptors due to a given project under the Focused GPU and BCSP. Construction noise would have the potential to exceed the 80 dBA Leq threshold, and impacts would be potentially significant.

Operational Noise

Implementation of the Focused GPU and BCSP would accommodate a range of land uses that have the potential to generate noise that may affect noise-sensitive receptors. These land uses include

residential development, commercial and office development, mixed-use development, civic and public development, and parks.

Residential Development

A variety of residential densities would be accommodated under the Focused GPU and BCSP, including low-density residential, medium-density residential, high-density residential, and hillside residential. Noise generated from residential uses is generally described as "nuisance noise." Nuisance noise is defined as intermittent or temporary neighborhood noise from sources such as amplified music, barking dogs, and landscape maintenance equipment that may disturb other residents. Nuisance noise impacts are more likely to occur in more densely developed areas, such as the Brea Core, where residences would be closer together and where neighbors would be more likely to hear a neighbor's dog or music. However, single-family development would also likely be exposed to occasional nuisance noise. BCC Chapter 8.20, Noise Control, prohibits nuisance noise from exceeding the noise standards at any time (PPP NOI-4). Compliance with the Brea Noise Control Ordinance would limit exposure to excessive nuisance noise. The Brea Police Department enforces the nuisance noise provisions of the Brea Noise Control Ordinance. Additionally, nuisance noises would differ in kind, duration, and location. Therefore, because the overall effects would be separate and, in most cases, would not affect the receptors at the same time, noise from residential development would not combine and exceed the Brea Noise Control Ordinance limits. Therefore, with required compliance with PPP NOI-4, nuisance noise in residential neighborhoods would be less than significant.

Commercial and Office Development

Commercial and office noise sources would be similar to existing conditions with implementation of the Proposed Project because these land uses currently exist in the City; however, development intensity would increase with implementation of the Proposed Project, especially in the BCSP area. The future mix of commercial and office uses is currently unknown, along with the specific noise-producing equipment associated with each use. The noise level generated by commercial uses on site would vary depending on the specific types of commercial uses that would occupy available space. The exact noise level generated cannot be specifically quantified at this time because of the many variables involved. These include the specific land use type, size of equipment, location and orientation of equipment, number and location of loading docks, and parking areas. Therefore, it would be speculative to determine the level of noise impact of individual commercial uses at specific locations at this time. Thus, the analysis focuses on typical noise produced from commercial development, including heating, ventilation, and air conditioning (HVAC) equipment; commercial truck deliveries at loading docks; and parking lots.

The specifications and locations of the HVAC systems that would be installed at commercial or mixed-use buildings are unknown at this time. However, systems would be typical of an urban

environment and similar to existing systems in the City. Additionally, HVAC systems would continue to be required to comply with the Brea Noise Control Ordinance. Areas zoned for commercial and office uses are subject to an hourly noise level limit of 55 dBA during the day and 50 dBA at night near sensitive residential uses as stated in the Brea Noise Control Ordinance. Future commercial and office development with HVAC system would be required to install acoustical shielding to meet the Brea Noise Control Ordinance hourly noise level limit standards, as outlined in Table 4.11-3. HVAC shielding or enclosures can achieve reductions of at least 15 dBA at the source and reduce typical noise to within noise ordinance limits (Sonic-Shield 2021). Therefore, impacts would be less than significant due to compliance with the noise limits outlined in the Brea Noise Control Ordinance.

In addition to HVAC systems, commercial land uses also have the potential to generate noise from truck deliveries, such as engines idling and beeping from back up warning signals at commercial loading docks. Truck trips would involve deliveries of supplies and products to commercial uses. State law (13 CCR 2485) currently prohibits heavy-duty diesel delivery trucks from idling more than 5 minutes. Therefore, noise from idling would be limited to 5 minutes during truck deliveries. Beeping from trucks would not be continuous and would only occur while the truck is backing up. Given the intermittent and short duration of noise from individual truck deliveries, truck deliveries would not be a source of excessive ambient noise. In compliance with State law and the noise limits outlined in the Brea Noise Control Ordinance, impacts would be less than significant.

Noise sources from parking lots include car alarms, door slams, radios, and tire squeals. These sources typically range from approximately 51 to 66 dBA at a distance of 10 feet (Gordon Bricken & Associates 2012) and are generally short term and intermittent. Parking lots have the potential to generate noise levels that exceed the 55 dBA 1-hour average sound level limit established in the Brea Noise Control Ordinance, as outlined in Table 4.11-3, depending on the location of the source; however, noise sources from parking lots would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect noise-sensitive receptors at the same time, and noise generated from parking lots would be considered less than significant.

Mixed-Use Development

The Focused GPU and BCSP would include mixed-use land use designations primarily within the BCSP area and southern areas of the City. As discussed previously, commercial development adjacent to or within the same property as multi-family residences would be required to comply with the stricter hourly noise level limit for multi-family residential use. Noise sources within future mixed-use development would be similar to commercial and office development discussed previously and would include noise from HVAC systems, truck deliveries, and parking lots. Noise generated from deliveries and parking lot sources would be intermittent and not necessarily occur at the same time. Noise from HVAC equipment would be restricted by the

noise level limits outlined in the Brea Noise Control Ordinance, stated in Table 4.11-3. Restaurants and bars may include entertainment such as live or amplified music; however, similar to HVAC equipment, operation would be subject to the noise level limits at affected receptors outlined in the Brea Noise Control Ordinance. Therefore, with required compliance with the Brea Noise Control Ordinance, impacts would be less than significant.

Industrial Development

Industrial land uses are primarily along the City's western and southern boundaries. The Focused GPU and BCSP would accommodate new industrial development. Operation of an industrial facility can generate noise associated with mechanical equipment (pumps, rooftop equipment, condenser units, HVAC units, and pneumatic equipment), operation-related vehicles, speakers, bells, chimes, and outdoor human activity in defined, limited areas. Light industrial uses typically include light manufacturing, warehouse, distribution, assembly, and wholesale uses. Heavy industrial uses typically include intense manufacturing, warehouse and distribution, assembly, and wholesale industrial operations that generate higher noise levels than light industrial uses. Industrial land uses would generally operate during normal daytime business hours and would not result in sleep disturbance. Additionally, if new industrial development were adjacent to existing NSLUs or an area zoned for residential use, it would be required to comply with the stricter hourly noise level limits for these land uses at the property line. New land uses would be required to meet HVAC equipment performance standards and implement equipment shielding as necessary. Therefore, compliance with the Brea Noise Control Ordinance would reduce potential impacts to a less than significant level.

Civic and Public Development

Noise sources from civic and public land uses, such as schools, government facilities, childcare facilities, and recreational facilities, include parking lot noise, children at play, athletic events, landscape maintenance, school bells, and public address systems. These land uses currently exist throughout the Focused GPU area and within the BCSP area. In addition, libraries and civic uses are not typical noise sources except for associated parking lots. Similar to nuisance noises in residential neighborhoods and from commercial and office development, noise sources from these land uses would be intermittent and would be different from each other in kind, duration, and location so that the overall effects would be separate and, in most cases, would not affect the same noise-sensitive receptors at the same time. Therefore, in compliance with the Brea Noise Control Ordinance, nuisance noise generated by civic and public land uses would also be less than significant.

Parks and Open Space

The Focused GPU area includes a park and open space land use designation. Implementation of the Focused GPU and BCSP would allow for additional parks and open space, primarily within the northeastern area of the City. Participants in recreational activities using the parks would be expected to generate noise levels typical of such activities. Active uses such as playgrounds and sports fields

typically generate incidental recreational noise, such as cheering for sports activities or children at play. Passive recreational activities such as walking, reading, and dining in open turf and picnic areas typically generate lower noise levels compared to active sports play. Similar to nuisance noises in residential neighborhoods from commercial and office development, noise sources from these land uses would be intermittent and different from each other in kind, duration, and location, so that the overall effects would be separate and, in most cases, would not affect the same noise-sensitive receptors at the same time. Future park and recreational uses may result in some nuisance noise but would be subject to the Brea Noise Control Ordinance, Section 8.20.070, which exempts any noise associated with activities conducted on any public park or playground from the City's exterior noise standards. Therefore, in compliance with the Brea Noise Control Ordinance, nuisance noise generated by park and recreational land uses would be less than significant.

Permanent Increases in Operational Traffic Noise Levels

Based on the noise standards in Table 4.11-2, noise levels above 65 dBA are normally unacceptable at sensitive receptor locations, such as residences, and the noise environment in these areas would be considered degraded. Based on this, the following thresholds of significance are used to assess traffic noise impacts at sensitive receptor locations:

- Greater than 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher.
- Greater than 3 dBA increase for ambient noise environments of 60 to 64 CNEL.
- Greater than 5 dBA increase for ambient noise environments of less than 60 dBA CNEL.

The following includes an analysis of increases in vehicle noise that may result from Project implementation, followed by an analysis of the potential for new sensitive receptors to be exposed to incompatible noise levels.

Permanent Increase in Vehicle Noise

Focused General Plan Update

The potential for implementation of the Focused GPU to permanently increase ambient noise levels as a result of increased traffic was assessed using standard noise modeling equations adapted from the Federal Highway Administration noise prediction model. Model output is provided in Appendix G of this PEIR. The modeling calculations take into account the posted vehicle speed, median width, average daily trip volume, and estimated vehicle mix. Traffic volumes and roadway characteristics with buildout of the Project were obtained from Kittleson & Associates (Appendix H). Noise levels were calculated at 50 feet from the centerline of each roadway segment. Generally, noise from heavily traveled roadways decreases by approximately 3 dBA for every doubling of distance. The actual sound level at any receptor location depends on factors such as source-to-receptor distance and the presence of intervening structures, barriers, vegetation, and topography; therefore, the calculated result represents the worst-case scenario.

As shown in Table 4.11-8, Existing Plus Future Focused GPU Buildout (2050) Traffic Noise Levels, the 12 roadway segments included in the traffic analysis study area that would experience the greatest increase in vehicle trips as a result of Project implementation are modeled to represent the potential changes in traffic noise conditions. Therefore, consistent with the traffic analysis, the significance of Project direct impacts on ambient noise levels is evaluated based on a comparison of existing conditions without Project implementation to future (2050) noise levels with Project implementation. All segments have an existing noise level at or above 65 dBA; therefore, the applicable threshold for all 12 segments is an increase greater than 1.5 dBA.

Table 4.11-8. Existing Plus Future Focused GPU Buildout (2050) Traffic Noise Levels

Roadway	Segment	Existing (dBA Ldn)	Threshold (dBA)	Existing Plus Future Project Buildout (2050) (dBA Ldn)	Increase in Noise Level from Existing	Significant Impact?
Brea Boulevard	North of Central Avenue	73.0	1.5	74.1	+1.1	No
Puente Street	Central Avenue to Lambert Road	67.9	1.5	68.4	+0.5	No
Lambert Road	**Sunflower Street to Valencia Avenue**	**72.9**	**1.5**	**75.3**	**+2.4**	**Yes**
State College Road	Lambert Road to Birch Street (BCSP)	71.6	1.5	72.3	+0.7	No
Birch Street	Brea Boulevard to Poplar Avenue (BCSP)	69.1	1.5	69	0.1	No
Associated Road	Birch Street and Imperial Highway (partial BCSP)	70	1.5	70.6	+0.6	No
Rose Drive	**Valencia Avenue and Vesuvius Drive**	**71.8**	**1.5**	**73.6**	**+1.8**	**Yes**
Imperial Highway	West of Puente Street	77	1.5	78	+1	No
	Berry Street and Brea Boulevard (BCSP)	77.2	1.5	78.3	+1.1	No
	Associated Road and Kingwood Court	77.0	1.5	77.8	+0.8	No
	Valencia Avenue and East City Border	78.1	1.5	79.0	+0.9	No
Carbon Canyon Road (SR-142)	East of Olinda Village	70.5	1.5	71.4	+0.9	No

Source: Appendix G, Noise Data, of the PEIR.

Notes: dBA = A-weighted decibel; Ldn = day-night noise level

Bold text represents a roadway segment with a potentially significant impact.

As shown in Table 4.11-8, implementation of the Focused GPU would have the potential to result in a direct noise impact on two segments: (1) Lambert Road from Sunflower Street to Valencia Avenue and (2) Rose Drive from Valencia Avenue and Vesuvius Drive.

Future development would be required to evaluate potential Project impacts on ambient noise levels and implement noise attenuation to the extent feasible in compliance with the 2003 Brea General Plan Public Safety Element and the Noise PPPs, which include compliance with the California Building Code, Title 24. Implementation of the 2003 Brea General Plan policies and compliance with Title 24 would reduce impacts related to permanent increases in noise levels but not necessarily to a less than significant level. Therefore, implementation of the Focused GPU would result in direct impacts related to permanent increases in vehicle noise.

Brea Core Specific Plan

Implementation of the BCSP to permanently increase ambient noise levels as a result of increased traffic was assessed using standard noise modeling equations adapted from the Federal Highway Administration (FHWA). Table 4.11-9, Existing Plus Future BCSP Buildout (2050) Traffic Noise Levels, shows the potential changes in traffic noise conditions on the 12 modeled roadway segments as a result of BCSP development.

Table 4.11-9. Existing Plus Future BCSP Buildout (2050) Traffic Noise Levels

Roadway	Segment	Existing (dBA Ldn)	Threshold (DBA)	Existing Plus Future BCSP Buildout (2050) (dBA Ldn)	Increase in Noise Level from Existing	Significant Impact?
Brea Boulevard	North of Central Avenue	73.0	1.5	73.3	+0.3	No
Puente Street	Central Avenue to Lambert Road	67.9	1.5	68.0	+0.1	No
Lambert Road	Sunflower Street to Valencia Avenue	72.9	1.5	73.8	+0.9	No
State College Road	Lambert Road to Birch Street (BCSP)	71.6	1.5	71.8	+0.2	No
Birch Street	Brea Boulevard to Poplar Avenue (BCSP)	69	1.5	68.6	-0.4	No
Associated Road	Birch Street and Imperial Highway (partial BCSP)	70	1.5	70.2	+0.2	No
Rose Drive	Valencia Avenue and Vesuvius Drive	71.8	1.5	72.4	+0.6	No
Imperial Highway	West of Puente Street	77	1.5	77.6	+0.6	No
	Berry Street and Brea Boulevard (BCSP)	77.2	1.5	77.5	+0.3	No
	Associated Road and Kingwood Court	77.0	1.5	77.3	+0.3	No
	Valencia Avenue and East City Border	78.1	1.5	78.4	+0.3	No
Carbon Canyon Road (SR-142)	East of Olinda Village	70.5	1.5	70.8	+0.3	No

Source: Appendix G, Noise Data, of the PEIR.

Notes: dBA = A-weighted decible; Ldn = day-night noise level

As shown in Table 4.11-9, implementation of the BCSP would not have the potential to result in a direct permanent increase in noise levels above the threshold on any study area segments. Therefore, implementation of the BCSP would not result in permanent increases in noise levels and impacts would be less than significant.

Noise Incompatibilities with New Sensitive Receptors

Focused General Plan Update and Brea Core Specific Plan

In addition to the potential to increase vehicle noise as a result of growth under the Focused GPU and BCSP, implementation of the Project would have the potential to result in the placement of new sensitive receptors in areas that would be exposed to vehicle noise levels in excess of the City's noise land use compatibility standards. As discussed previously, new sensitive receptor development would be concentrated near major City roadways, which have the potential to generate noise levels in excess of 65 dBA CNEL and with and without the Project. This would generally be considered an impact of the environment on the project and is not considered a CEQA issue. However, new sensitive receptor development that is planned under the Focused GPU and BCSP would be subject to PPP Noi-1 that would require acoustical studies to demonstrate compliance with City and state interior and exterior ambient noise level limits. A potentially significant impact would not occur.

Summary

Construction from development of land uses accommodated by the Proposed Project would be subject to the Brea Noise Control Ordinance limits, which restrict the hours of construction activity. However, because specific Project-level information is not yet available, it is assumed that construction noise could have the potential to exceed the 80 dBA Leq threshold and that construction noise impacts would be potentially significant.

Operation of the Project would be required to comply with the Brea Noise Control Ordinance, and operational impacts related to residential, commercial and office, mixed-use, industrial, civic and public development, and parks and open space developments would be less than significant.

The buildout of the Focused GPU would result in permanent increases in traffic noise levels to two roadway segments (Lambert Road from Sunflower Street to Valencia Avenue and Rose Drive from Valencia Avenue and Vesuvius Drive); therefore, traffic noise impacts would be potentially significant. Traffic noise impacts from buildout of the BCSP would not result in permanent increases in traffic noise. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation: Potentially significant (construction and operation).

Mitigation Measures: Mitigation Measures MM NOI-1 and MM NOI-2 would be required.

Level of Significance After Mitigation: Significant and unavoidable.

4.11.4.2 Threshold NOI-b: Generation of excessive groundborne vibration or groundborne noise levels.

Impact Analysis

Groundborne vibration that would potentially occur through implementation of the Focused GPU and BCSP would result from construction equipment and, following construction, industrial sources that may result in operational impacts from heavy machinery. Other land uses accommodated under the Focused GPU and BCSP, including proposed residential, commercial, and civic uses, are not land uses that typically generate groundborne vibration and, therefore, are not addressed below.

Focused General Plan Update and Brea Core Specific Plan

Construction

Construction activities would generate varying degrees of ground vibration depending on the construction procedures and equipment. The operation of construction equipment generates vibration that spreads through the ground and diminishes with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. Vibration from construction activities rarely reaches the levels that can damage structures, but can achieve the audible and perceptible ranges in buildings close to the construction site.

The City has established a vibration threshold of 0.003 in/sec, equal to 70 VdB, which is the applicable significance threshold for groundborne vibration for this analysis. Typical vibration levels for construction equipment that may be required for future projects proposed under the Focused GPU and for construction under the BCSP are provided in Table 4.11-10, Vibration Source Levels for Typical Construction Equipment. As shown in Table 4.11-10, all vibration levels from all construction equipment except the vibratory roller would attenuate to below 70 VdB at 100 feet from the source. Vibration levels from a vibratory roller would attenuate to below 70 VdB at 165 feet.

Table 4.11-10. Vibration Source Levels for Typical Construction Equipment

Construction Equipment	Approximate VdB at 25 Feet	Approximate VdB at 100 Feet[1]	Approximate VdB at 165 Feet
Large Bulldozer	87	69	62
Caisson Drilling	87	69	62
Loaded Trucks	86	68	61
Small Bulldozer	58	40	33
Jackhammer	79	61	54
Vibratory Roller	94	76	69

Source: FTA 2018.
Notes: VdB = vibration decibel
[1] Based on the formula VdB = VdB(25 feet) – 30log(d/25) provided by the FTA (2018).

Construction of future uses consistent with the Focused GPU and BCSP would take place during the day as required by the Brea Noise Control Ordinance. Therefore, vibration-related construction activities are only permitted during the day, and the threshold for sleep disturbance is not applicable. However, vibration-sensitive land uses are found throughout the Project area, including BCSP area. Residences may be occupied during daytime construction, and construction may result in a nuisance to daily activities.

Based on the information shown in Table 4.11-10, a potential impact would occur if future typical construction activities would occur within 100 feet of an adjacent occupied land use or 165 feet if a vibratory roller would be required. Because no specific construction is proposed at this time, it cannot be guaranteed that vibration levels would not exceed the thresholds at the nearest sensitive receptors. Therefore, impacts to vibration-sensitive land uses during construction would be potentially significant.

Operation

New industrial land uses would be accommodated under the Focused GPU, primarily along the City's eastern boundary. An additional approximately 3 million square feet of non-residential uses would also be allowed under the Light Industrial use category. The operation of future industrial facilities could generate groundborne vibration associated with heavy mechanical equipment. New industrial land uses would be subject to the BCC Section 20.20.040, which regulates sources of groundborne vibration. Vibration is limited to a displacement of the earth of 0.003 inch per second or less as measured at any point along the property line of the use. According to the FTA, vibration levels below 0.12 inch per second would not result in damage to even the most sensitive buildings (FTA 2018). Therefore, the BCC limits vibration levels to low levels. Compliance with the BCC would reduce potential groundborne vibration impacts from industrial land uses to less than significant.

Level of Significance Before Mitigation: Potentially significant for construction impact and less than significant for operation impact.

Mitigation Measures: Mitigation Measure MM NOI-3 would be required for construction. No mitigation measure is required for operation.

Level of Significance After Mitigation: Less than significant (construction)

4.11.4.3 Threshold NOI-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, exposure of people residing or working in the Project area to excessive noise levels.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

There are no public airports or private airstrips within the City. The City is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airports to the City boundaries are Fullerton Municipal Airport and Orange County Steel Salvage Heliport, located approximately 4.28 miles southwest and 3.96 miles south, respectively, from the City boundary. The City is entirely outside the airport influence area, including the noise contours for Fullerton Municipal Airport (ALUC 2019) and the Helipad Protection Zones for the Orange County Steel Salvage Heliport. Therefore, implementation of the Project would not expose people residing or working in the Focused GPU or BCSP areas to excessive noise levels. No impact would occur.

Level of Significance Before Mitigation: No Impact

Mitigation Measures: No mitigation measures are required.

4.11.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to noise that could result from implementation of the Proposed Project. The geographic setting for noise is typically localized but considers cumulative regional growth by using the regional traffic model. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.11.5.1 Cumulative Threshold NOI-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.

Focused General Plan Update and Brea Core Specific Plan

A cumulative ambient noise impact would occur if development associated with cumulative regional land use projects would result in an increase in ambient noise that would exceed the City's noise standards. As discussed in Chapter 3, Environmental Setting, the proposed Focused GPU and BCSP are inherently cumulative and consider cumulative development that could occur in the

Project area over a defined time frame. Development proposed under the cumulative projects would be subject to regulations that require compliance with the Brea Noise Control Ordinance and Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions). Future individual projects would be required to implement construction best management practices (MM NOI-1) to reduce construction noise impacts. Buildout of the Focused GPU along with future regional growth, would result in increases in traffic that would cumulatively increase traffic noise. As shown in Table 4.11-8, a cumulatively considerable impact would occur on the modeled segment of Lambert Road and Rose Drive. Both the Focused GPU and BCSP would contribute to regional vehicle volumes and result in a cumulatively considerable impact. As shown in Table 4.11-11, Future Focused GPU Buildout (2050) Traffic Noise Levels without BCSP, the Focused GPU would not exceed the applicable 1.5 dBA threshold without the contribution of noise attributable to the BCSP. As such, the BCSP would result in a cumulatively considerable contribution to this impact. Mitigation Measure MM NOI-2 would reduce impacts from vehicle noise by implementing noise reduction measures where feasible. While this mitigation would reduce the Project's incremental contribution to the cumulative impact to the extent feasible, the Proposed Project would have the potential to result in a cumulatively considerable contribution to a cumulatively significant impact.

Table 4.11-11. Future Focused GPU Buildout (2050) Traffic Noise Levels without BCSP

Roadway	Segment	Increase in Noise Level from Focused GPU	Increase in Noise Level from BCSP	Increase in Noise Level without BCSP	Exceeds 1.5 dBA?
Lambert Road	Sunflower Street to Valencia Avenue	+2.4	+0.9	+1.5	No
Rose Drive	Valencia Avenue and Vesuvius Drive	+1.8	+0.6	+1.2	No

Level of Significance Before Mitigation: Potentially significant (construction and operation)

Mitigation Measures: Mitigation Measures MM NOI-1 and MM NOI-2 would be required.

Level of Significance After Mitigation: Significant and unavoidable.

4.11.5.2 Cumulative Threshold NOI-b: Generation of excessive groundborne vibration or groundborne noise levels.

Focused General Plan Update and Brea Core Specific Plan

A cumulative groundborne vibration impact would occur if one or more projects in the area would increase vibration to a level that would result in sleep disturbance or interfere with activities at vibration-sensitive land uses. Groundborne vibration impacts could result from construction operations. Since there are no specific plans or time scales for future construction projects, it is not possible to determine exact noise levels, locations, or time periods for construction. Construction activities such as pile driving or vibratory roller can result in significant vibration up to 165 feet

from the source. However, this short distance is unlikely to combine with other cumulative construction projects to result in combined construction impacts. In addition, cumulative projects would be required to implement vibration management practices such as Mitigation Measure NOI-3; which would further reduce groundborne vibration to adjacent uses. The Proposed Project, in combination with other proposed cumulative projects, would not result in a significant cumulative groundborne vibration impact. The impact would not be cumulatively considerable.

Level of Significance Before Mitigation: Potentially significant for construction and less than significant for operation.

Mitigation Measures: Mitigation Measure MM NOI-3 would be required for construction.

No mitigation measures are required for operation.

Level of Significance After Mitigation: Less than significant.

4.11.5.3 Cumulative Threshold NOI-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, exposure of people residing or working in the Project area to excessive noise levels.

Focused General Plan Update and Brea Core Specific Plan

Airport-related noise is generally site specific and not cumulative. The placement of a structure within the noise contours of a public airport or within proximity to a private airstrip would not affect airport noise related to the placement of another cumulative project. Additionally, development and construction proposed under the cumulative projects would be subject to regulations that require compliance with noise standards. The Focused GPU area and BCSP area are outside the noise contours for any airport. Therefore, the Project, in combination with other cumulative projects, would not result in a cumulative impact related to public use airports.

Level of Significance Before Mitigation: No Impact

Mitigation Measures: No mitigation measures are required.

4.11.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold NOI-c would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP NOI-1 through PPP NOI-5, and applicable Focused GPU goals, policies, and actions (refer to Appendix C).

Without mitigation, environmental impacts related to Threshold NOI-a pertaining to exceedance of noise standards during construction and operation and Threshold NOI-b pertaining to excessive groundborne vibration during construction would be potentially significant. Permanent increases

in traffic noise as a direct result of the BCSP would be less than significant without mitigation. However, the BCSP and Focused GPU would result in a cumulatively considerable impact under Cumulative Threshold NOI-a.

4.11.7 Mitigation Measures

MM NOI-1 **Construction Noise Best Practices.** Prior to any construction activity, such as grading, site preparation, or issuance of building permits, a note shall be provided on the construction plans indicating that during construction activities, the project applicant shall be responsible for requiring contractors to implement the following measures to limit construction-related noise to a performance standard of 80 A-weighted decibel equivalent continuous sound level at the property line of the nearest sensitive receptor:

- Brea City Code, Section 8.20.070, limits construction activity to the daytime hours between 7:00 a.m. and 7:00 p.m. on Monday through Saturday. Construction is not allowed on Sundays and Federal holidays.
- During the entire active construction period, equipment and trucks used for the project construction shall use the best available noise control techniques (e.g., improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Require that impact tools (e.g., jack hammers and hoe rams) be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses.
- Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
- Construction traffic shall be limited—to the extent feasible—to approved haul routes established by the City of Brea.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.
- Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the noise standards after other measures have been considered, or occur

at nighttime, or when the anticipated construction duration is greater than is typical (e.g., 2 years or more).

MM NOI-2 Roadway Noise Measures. Before the approval of building permits, project applicants for future development projects proposed as a result of the Focused General Plan Update shall evaluate whether projects would have the potential to exceed any of the following thresholds based on the Brea General Plan Community Noise and Land Use Compatibility standards:

- Greater than 1.5 A-weighted decibel increase for ambient noise environments of 65 A-weighted decibel Community Noise Equivalent Level and higher.
- Greater than 3.0 A-weighted decibel increase for ambient noise environments of 60 to 64 A-weighted decibel Community Noise Equivalent Level.
- Greater than 5.0 A-weighted decibel increase for ambient noise environments of less than 60 A-weighted decibel Community Noise Equivalent Level.

A project that would potentially exceed the above thresholds shall complete a site-specific Noise Technical Study to determine if the project would result in a significant increase in traffic noise. This Noise Technical Study shall be prepared by a qualified acoustical analyst. The following screening levels may be applied to determine whether a Noise Technical Study is required:[1]

- If existing roadway segments serving the project have an average daily traffic below 1,800, a Noise Technical Study is required if the project would potentially double segment average daily traffic.
- If existing roadway segments serving the project have an average daily traffic of 1,800 or higher, a Noise Technical Study is required if the project would generate more than 750 average daily traffic.

If a significant increase in vehicle noise level is identified as a result of individual project implementation, the project shall incorporate buffers or other noise reduction measures to the extent feasible to reduce noise levels at affected sensitive receptors to a normally acceptable noise level. Reduction measures that shall be considered include but are not limited to alternative road design, reduced speeds, alternative paving, building retrofits to provide additional noise attenuation, and setbacks or buffers before berms and walls. The noise reduction measures shall be designed by a qualified acoustical engineer. Where noise reduction measures in the public right-of-way are

[1] Based on the study area segments, a roadway with 1,800 average daily traffic or higher has the potential to exceed 65 A-weighted decibels and be subject to the 1.5 A-weighted decibel increase thresholds. A more than 750 average daily traffic increase has the potential to result in a 1.5 A-weighted decibel Community Noise Equivalent Level increase. Roadway segment with below 1,800 average daily traffic would generally not generate noise levels above 65 A-weighted decibel Community Noise Equivalent Level and would be subject to the 3 A-weighted decibel Community Noise Equivalent Level or 5 A-weighted decibel Community Noise Equivalent Level thresholds. A doubling of roadway volume typically results in a 3 A-weighted decibel Community Noise Equivalent Level increase in noise level (Caltrans 2013a).

infeasible, the project applicant shall conduct outreach to potentially affected sensitive receptors to determine the feasibility of noise reduction measures on private property, including a noise barrier or building retrofits. Based on affected receptor response, a qualified acoustical engineer shall determine the feasibility of a noise barrier on private property and/or the extent of required building retrofits. The project applicant shall submit plans to the City of Brea Community Development Department for review and approval before the start of any construction. These plans shall demonstrate that the proposed noise reduction measures would reduce traffic noise exposure at sensitive receptors to the extent feasible.

MM NOI-3 Vibration Best Management Practices. Prior to the start of construction activities requiring a Building Permit that involve typical construction equipment within 100 feet of the property line of occupied neighboring uses or within 165 feet of the property line of occupied neighboring uses with the use of a vibratory roller (or equivalent), the project applicant shall identify best management practices to be implemented by the construction contractor to minimize vibration levels in accordance with the Brea City Code Section 20.20.040 limit to ground vibration. The best management practices shall be included in project construction documents, including the Grading Plans and contract with the construction contractor. Practices may include but not be limited to the following:

- Use only properly maintained equipment with vibratory isolators
- Operate equipment as far from sensitive receptors as possible
- Use rubber-tired vehicles as opposed to tracked vehicles

4.11.8 Level of Significance After Mitigation

Threshold NOI-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.

Focused General Plan Update and Brea Core Specific Plan

Mitigation Measure MM NOI-1 would reduce construction noise to less than significant. Implementation of MM NOI-2 would reduce impacts from vehicle noise by implementing noise reduction measures where feasible. However, roadway noise buffers and additional noise reduction measures would not necessarily be feasible in all circumstances throughout the City, including the BCSP area. Future projects put forward through implementation of the Focused GPU and BCSP would continue to be subject to results according to the noise standards under CEQA and the 2003 Brea General Plan but cannot be determined to be less than significant at

this time. Therefore, permanent increases in vehicle noise as a result of the Project would remain significant and unavoidable.

Threshold NOI-b: Generation of excessive groundborne vibration or groundborne noise levels.

Focused General Plan Update and Brea Core Specific Plan

Mitigation Measure MM NOI-3 would reduce groundborne vibration during construction to less than significant. No significant and unavoidable impacts would remain.

4.12 Public Services

This section evaluates the potential for impacts on hazards and hazardous materials resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

4.12.1 Fire Protection and Emergency Services

4.12.1.1 Environmental Setting

Regulatory Background

Federal

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire-and life-safety regulations, with topics addressing Fire-Department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building officials.

State

California Building Code

The California Building Code (CBC), located in Part 2 of Title 24 of the California Code of Regulations, establishes the minimum State building standards. The CBC is currently updated every three years. The most recent update is the 2025 CBC, effective starting January 1, 2026. It is based on the 2024 International Building Code but amended to account for California conditions. The CBC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local needs. Commercial and residential buildings are plan-checked by City building officials for compliance with the CBC. Typical fire safety requirements of the CBC include installing sprinklers in buildings; establishing fire resistance standards for fire doors, building materials, and particular types of construction; and clearing debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

The California Fire Code (CFC) (California Code of Regulations, Title 24, Part 9) sets forth emergency access, emergency egress routes, interior, and exterior design and materials, fire safety features, including sprinklers, and hazardous materials. The CFC is issued on a 3-year cycle; the

2025 edition took effect January 1, 2026, and was adopted and incorporated by reference in Chapter 16.04 (Fire Code) of the Brea City Code (BCC).

California Wildland-Urban Interface Code

The California Wildland-Urban Interface Code (CWUIC) is a new, consolidated set of wildfire safety regulations adopted into Title 24, Part 7 of the California Building Standards Code. It became effective January 1, 2026, and is based on the 2024 International Wildland-Urban Interface Code (IWUIC) with California-specific amendments. The CWUIC is organized into the following chapters with distinct purposes:

- Chapter 1: Scope and Administration
- Chapter 2: Definitions
- Chapter 3: Wildland-Urban Interface Areas
- Chapter 4: WUI Area Requirements
- Chapter 5: Special Building Construction Regulations
- Chapter 6: Fire Protection Requirements
- Chapter 7: Referenced Standards

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Wildfire and Forest Resilience Action Plan

The California Wildfire and Forest Resilience Action Plan is the State's "road map" for reducing the risk of wildfire. The overall goal of the plan is to reduce total costs and losses from wildland fire in California through focused, pre-fire management prescriptions and increased initial attack success. The current plan was released in January 2021 and provides guidance to local jurisdictions in meeting State goals.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270, Fire Prevention, and 6773, Fire Protection and Fire Fighting Equipment, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include but are not limited to guidelines on the handling of highly combustible materials, firehouse sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Local

Brea City Code

BCC Chapter 16.04, Brea Fire Code states that the 2025 edition of the California Wildland-Urban Interface Code and CFC, together with the amendments, additions, deletions, and exceptions are adopted by reference as the Fire Prevention Code of the City.

2003 Brea General Plan

The 2003 Brea General Plan, Chapter 6, Public Safety, includes goals and policies aimed at ensuring public safety by protecting the community from hazards associated with wildland fires. Applicable policies include:

- **Policy PS-1.2.** Provide up-to-date technology to the Brea Police and Fire Department.
- **Policy PS-1.4.** Work with the Fire Department to determine and meet community needs for fire protection and related emergency services. Ensure that sufficient stations, personnel, and equipment are provided to meet growth needs in the City.
- **Policy PS-1.5.** Maintain a maximum 4- to 6-minute emergency response time for fire safety services. Maintain a 3- to 5-minute response time from emergency police response services. Require that all new development be able to meet established standards for such response.
- **Policy PS-1.6.** Impose special conditions as needed on development projects to ensure that adequate fire protection measures are in place and maintained.

City of Brea Emergency Preparedness Program

Brea is well prepared to respond to all types of emergencies. The City's Emergency Preparedness Program addresses appropriate responses to major earthquakes, hazardous materials accidents, wildfire, and dam failure. The Emergency Preparedness Program describes how emergency response will be coordinated and how evacuation of residents will proceed. Program objectives include injury reduction and avoiding loss of life and property damage through effective management of emergency forces. The City of Brea's Emergency Preparedness Program is coordinated by a professional emergency manager, and includes the following five key elements:

- Development and maintenance of the City's Emergency Response Plan.
- Development and maintenance of the City's Emergency Operations Center.
- Coordination of preparedness, training, and exercises for City staff to be sure they are ready to respond to any emergency.
- Public education and outreach to the residents and businesses of Brea.
- Fund recovery following disasters.

Existing Conditions

Fire Stations, Equipment, Staffing, and Mutual Aid

Brea Fire Department

Fire protection services in the City are provided by the Brea Fire Department. The Fire Suppression Division consists of 45 firefighters, six fire prevention staff, 22 ambulance operators, two professional staff, five chief officers, one emergency medical services manager, and three fire chaplains. Suppression personnel staff four fire stations and one administration office. Each station responds based on GPS-based closest-unit dispatching, rather than fixed geographic zones. This system ensures the nearest available unit is dispatched regardless of station boundaries. The following fire stations are located within the city (Table 4.12-1, Brea Fire Department Fire Stations and Equipment Serving the Project Area).

Table 4.12-1. Brea Fire Department Fire Stations and Equipment Serving the Project Area

Station	Address	Equipment
Brea Fire Department – Station #1	555 North Berry Street, Brea	Type 1 – Advanced Life Support, Houses single 4-person paramedic engine company
Brea Fire Department – Station #2	200 North Brea Boulevard, Brea	Pierce/tiller – Advanced Life Support (ALS), Houses a battalion chief, four-person paramedic truck company, type-3, two-person BLS ambulance, reserve equipment and the city's historic Seagrave fire engine
Brea Fire Department – Station #3	2600 East Santa Fe Rd, Brea	Type 1 - Four-person paramedic engine company, two-person BLS ambulance, and specialized UTV (utility terrain vehicle) and reserve equipment
Brea Fire Department – Station #4	198 Olinda Place, Brea	Type 1 – Three-person Paramedic Assessment Unit (PAU)and includes two types of engines a Type 3 which is "brush specific" for the area it serves and a Type 1 which is used for structure fires and other emergency incidents

Source: City of Brea 2020.

Brea Fire Department is an all-hazard agency and I participates in the California mutual aid system. Mutual aid is emergency assistance that is dispatched upon request across jurisdictional boundaries. The Los Angeles County Fire Department, Fullerton Fire Department, Orange County Fire Authority, and Placentia Fire and Life Safety Department provide mutual aid to the City through the system.

Fire protection and emergency services in the Sphere of Influence (SOI) are provided by the Orange County Fire Authority (OCFA). The following fire station serves Brea's SOI:

- OCFA Fire Station #10 located at 18422 E. Lemon Dr. Yorba Linda, CA 92886

Metro Cities Fire Authority

Metro Cities Fire Authority, also known as Metro Net Fire Dispatch, is an emergency communications center in Orange County. Metro Cities Fire Authority provides 911 fire and Emergency Medical Services (EMS) dispatch services to more than one million people in an area of approximately 200 square miles. Under a joint-powers authority agreement, Metro Cities Fire Authority serves the Cities of Anaheim, Brea, Fountain Valley, Fullerton, Huntington Beach, Newport Beach, and Orange.

In 2024, 127,096 calls were dispatched, and approximately 82 percent of the calls dispatched were medical in nature (Metro Cities Fire Authority 2022).

Response Times

Performance objectives for the Brea Fire Department are based on the National Fire Protection Association's (NFPA) Standard 1710 (Fire and EMS Department 2025). NFPA 1710 standards are measured at the 90th percentile and serve as benchmarks, not confirmed compliance. Achieving these times depends on staffing, station location, apparatus deployment, and call volume. The City has the following firefighter turnout time performance benchmarks for different call types:

- **Medical Calls:** To put on the appropriate gear and get on the fire apparatus for a medical call, crews have 60-second NFPA 1710 turnout benchmark from time of dispatch.
- **Fire/Traffic Accidents:** To put on the appropriate gear and get on the fire apparatus for a fire or traffic accident, the City of Brea uses an 80-second local operational objective from time of dispatch.
- **First Fire Apparatus to Arrive on Scene:** The NFPA 1710 benchmark for the first-due unit is 240 seconds (four minutes) of travel time from leaving the station to arrival on scene.
- **Initial Full Alarm to Arrive on Scene:** For a multiunit response such as a house fire, one Battalion Chief, three Engine Companies, and one Ladder Truck are dispatched. The NFPA 1710 benchmark for the full alarm is 480 seconds (eight minutes) of travel time and requires 15-17 responding personnel, depending on fire flow.

Development Fees

Brea City Code, Chapter 3.32, provides for the City's ascertainment and recovery of costs reasonably borne from fees and charges levied in providing regulations, products, and services. The City imposes various user fees, including fire services to recover the costs of staff time and other expenses related to providing services. Costs reasonably borne include all applicable direct costs, all applicable indirect costs, general overhead, and departmental overhead, to the extent permitted by law. The City has previously adopted user fees by Resolution No. 2018-048,

Resolution No. 2018-053, Resolution No. 2020-046, Resolution No. 2021-042, and Resolution No. 2022-001, and recently adopted Resolution No. 2025-068 on December 16, 2025. Resolution No. 2025-065 comprehensively updated user fees to recover the costs of staff time and other expenses related to providing services (i.e., administrative, utilities, planning, building, fire, police, and public works). The updated user fees are included in Exhibit A, User Fee Schedule, to Resolution No. 2025-068, and this fee schedule will become effective on March 1, 2026.

Dispatch Impact Fees: Ordinance No. 968 authorized the City of Brea to establish dispatch impact fees as necessary for upgrading police and fire dispatch systems, thus ensuring that new development is provided with appropriate public safety services. The fees are updated periodically, and applicable development projects are subject to the fee schedule in effect at the time of payment.

Fire Impact Fees: Ordinance No. 969 authorized the adoption of fire impact fees for the City. The purpose of the fee is to ensure that new development fund its fair share of fire protection facilities. The fees fund the cost of building a fire station and/or to purchase new fire engines and equipment required to serve new development. The fees are updated periodically, and applicable development projects are subject to the fee schedule in effect at the time of payment.

Brea Fire Department Plan Check and Inspection Fees: The City charges fees for services performed in support of development projects processed. The fees for technical and inspection staff time spent on a project are based on an hourly rate. The fees are updated periodically, and applicable development projects are subject to the fee schedule in effect at the time of payment.
Fire Service Connection Fees: Fire Service Connection fees are applicable to all new construction where fire service is to be installed, with the charge payable at the time the Building Permit is issued by the City. Fire service connection fees are buy-in fees used to recover the cost of existing reservoir storage and water system capacity for private fire systems. The fees are updated periodically, and applicable development projects are subject to the fee schedule in effect at the time of payment.

Wildfire Hazard Zones

Figure 4.8-3, Fire Hazard Severity Zones (FHSZ), in Section 4.8, Hazards and Hazardous Materials, shows that the northernmost and easternmost portion of the City boundary where more hilly and mountainous regions of the Project area are designated as a Very High Fire Hazard Severity Zone (FHSZ). This includes neighborhoods of concern for evacuation like Blackstone/Olinda Ranch, Olinda Village, and Heritage Hills. On the southern edge of the Very High FHSZ boundary lies the High FHSZ and on the southern edge of the High FHSZ lies the Moderate FHSZ. Only the northeastern corner of BCSP area lies within the Moderate FHSZ. The City's SOI area contains a large portion of land in the Very High FHSZ.

Wildland-Urban Interface

The wildland-urban interface is the zone of transition between unoccupied land and human development. It is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels (U.S. Fire Administration 2025). Carbon Canyon, located in northern Orange County and adjacent to Los Angeles and San Bernardino counties, comprises approximately 1,758 acres and is part of the wild land/urban interface in Brea.

4.12.1.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Project would have a significant effect on public services if it would:

- 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:
  - **Threshold PS-a(i):** Fire protection

4.12.1.3 Plans, Programs, and Policies

Compliance measures are regulations imposed uniformly by the approving agency based on the proposed action taken and are required of the Project to reduce its potential environmental effects. Because these features are standard requirements, they do not constitute mitigation measures. The following measures are existing plans, programs, or policies (PPP) that apply to the Project and will help to reduce and avoid potential impacts related to public services:

PPP PS-1 **Fire Regulations.** New buildings developed under the Focused General Plan Update and the Brea Core Specific Plan are required to meet the fire regulations outlined in California Health and Safety Code (Sections 13000 et seq.).

PPP PS-2 **Development Fees.** Development under the Focused General Plan Update and the Brea Core Specific Plan will be required to pay the latest adopted Development Fees (e.g., Fire Department plan check and inspection fees, fire service connection fees, dispatch impact fees, and fire impact fees), as applicable.

PPP PS-3 **Brea Fire Code.** All development developed under the Focused General Plan Update and the Brea Core Specific Plan will be designed, built, and operated in accordance with the City of Brea's City Code, Chapter 15.08, Building Code, and Chapter 16.04, Brea Fire Code.

PPP PS-4 **Site and Design Review.** The Brea Fire Department will require approval of Fire Plan Check for Site Plan and Emergency Access. Additional design features to address the Brea Fire Department's requirements will be incorporated as conditions of approval for development under the Focused General Plan Update and the Brea Core Specific Plan.

PPP PS-5 **Fire Safety Standards.** For each new development facilitated under the Focused General Plan Update and the Brea Core Specific Plan, fire plans shall be submitted and reviewed by the Brea Fire Department to ensure compliance with fire safety and emergency response standards.

PPP PS-6 **Fuel Modification Standards.** All development under the Focused General Plan Update will be designed, built, and operated in accordance with the Brea Fire Department's Very High Fire Hazard Severity Zone–Fuel Modification requirements, if applicable.

PPP TRA-2 **Traffic Control and Staging.** A site-specific construction worksite staging and traffic control plan within the public right-of-way will be prepared and submitted to the City of Brea for review and approval prior to the start of any construction work. This plan will include such elements as the location of any potential partial lane closures within the public right-of-way, hours during which lane closures (if any) would not be allowed, local traffic detours (if any) that may require rerouting of traffic through the public right-of-way, and protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs). The project applicant will be required to comply with the City-approved plan measures, including any specific regulations for construction activities and traffic control in the public right-of-way.

The new or updated general plan goals and policies related to public services are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the PEIR.

4.12.1.4 Environmental Impacts

The following sections address various potential impacts relating to fire protection services that could result from implementation of the Proposed Project.

Threshold PS-a(i): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Analysis

Focused General Plan Update

Implementation of the Focused GPU would accommodate additional residential, commercial, and mixed-use development within the City. Development in the SOI would require annexation, after which the Brea Fire Department would provide fire protection and emergency medical services. Population and employment growth associated with the Focused GPU would incrementally increase demand on fire protection services.

The Brea Fire Department currently operates a network of strategically located fire stations that provide full coverage to the City's developed areas. The existing roadway network, and station distribution, current response time and performance objectives are being met.

All future development would be reviewed by Brea Fire Department for compliance with BCC Chapter 16.04, Brea Fire Code, California Building Code, California Health and Safety Code, and other existing regulatory requirements as discussed in Section 4.12.1.1 and Section 4.12.1.3. This review includes requirements related to fire flow, hydrant spacing, emergency access, evacuation, and WUI hazard mitigation. Compliance with these standards ensures that Project-level fire risks are addressed and helps maintain acceptable service levels over time. In addition, new development is required to pay Development Fees, including Dispatch Impact Fees, Fire Impact Fees, Plan Check and Inspection Fees, and Fire Service Connection Fees, which fund future fire protection facilities, vehicles, and equipment. Under the Focused GPU, additional service demand may require new or expanded fire stations, increases in staffing levels, additional apparatus, and changes in deployment strategies in order to maintain acceptable service levels as call volume and population increase. While future demands could eventually trigger the need for new or expanded facilities, the Focused GPU is a policy document and does not itself trigger the immediate need for new fire stations or major fire protection improvements. Additionally, the City would evaluate fire service needs periodically through deployment analysis, staffing assessments, and ongoing Standards of Coverage and Community Risk Assessment work. Development Fees, including Dispatch Impact Fees, Fire Impact Fees, Plan Check and Inspection Fees, and Fire Service Connection Fees may need to be re-evaluated and updated to ensure that new development

contributes its fair share toward the facilities, staffing, and apparatus needed to support Citywide growth. Furthermore, the Focused GPU Public Safety Element Goal PS-1 Wildland Fire Abatement: A community that is minimally impacted by fires through implementation of proactive fire hazard abatement strategies; Goal PS-6 Emergency Management: A City well-prepared for response and management to minimize disaster impacts; Community Development Element Goal CD-4 Hillside Development: Minimize development in the hillsides and mitigate adverse consequences of urbanization; and Goal CD-5 Infrastructure: Provide sufficient levels of water, sewer, and storm drain service throughout the community, include associated policies and actions that would support in providing adequate fire protection services within the City (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions). In particular, the following policies and action items as part of Goal PS-6 Emergency Preparedness would help reduce fire services impacts:

- **Policy PS-6.1:** Critical Facilities. Coordinate to ensure the resilience of lifeline infrastructure.
- **Policy PS-6.3:** Communication. Maintain proper protocols among all emergency service providers.
- **Policy PS-6.4:** Education. Prepare the community for efficient response and evacuation.
- **Policy PS-6.5:** Automatic and Mutual Aid. Participate in aid agreements with adjacent providers.
- **Policy PS-6.6:** Evacuation Routes. Work with Fire/Police to define standards and assessment ranges.
- **Policy PS-6.7:** Emergency Shelters. Periodically review supply and equipment availability.
- **Policy PS-6.8:** Collaboration. Link emergency services with mitigation programs.
- **Policy PS-6.9:** Institutions. Coordinate response procedures with major employers and schools.
- **Policy PS-6.11:** Warning Systems. Maintain and upgrade mass communications systems.
- **Policy PS-6.12:** Strategic Readiness. Maintain proactive, data-driven planning through recurring five-year cycles.
- **Action PS-6a:** Regularly practice implementation of the Emergency Operations Plan.
- **Action PS-6b:** Coordinate local response procedures with county and State plans.
- **Action PS-6c:** Continue implementing the Brea Local Hazard Mitigation Plan.
- **Action PS-6e:** Prepare five-year strategic plans for both Fire and Police Departments.
- **Action PS-6f:** Update technical studies for Fire Department five-year plans.
- **Action PS-6g:** Evaluate public safety impacts of new development using standard methodologies.
- **Action PS-6h:** Publish a Public Safety Impact Methodology Manual.
- **Action PS-6i:** Adopt Department Service Level Objectives (SLOs).
- **Action PS-6j:** Provide annual reports on adopted SLOs.
- **Action PS-6k:** Require phasing for major developments to prevent response degradation.

- **Action PS-6l:** Require fair-share contributions to mitigate public safety impacts.
- **Action PS-6m:** Maintain consistency between strategic plans and the General Plan/CIP.
- **Action PS-6n:** Maintain standardized public safety data and publish an annual scorecard.

Additionally, although increased service demand may require new or expanded fire stations, construction of such facilities is typically small-scale and would likely occur in urbanized areas on previously disturbed land, thereby reducing the likelihood of substantial adverse physical impacts. Given the incremental nature of anticipated growth and the speculative need for new or expanded fire facilities, it is assumed that additional environmental review would be required if such facilities are proposed. Accordingly, impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The Brea Core Specific Plan (BCSP) focuses on development within the City's downtown and central commercial corridors, including areas along Brea Boulevard, Birch Street, Lambert Road, and Imperial Highway. This portion of the City is already highly developed and contains the greatest concentration of commercial, institutional, and mixed-use activity in Brea. It is also one of the best served areas in terms of emergency response, with multiple Brea Fire Department stations located within a short distance and capable of meeting established response-time objectives. Fire Station 2 is located at 200 North Brea Boulevard within the BCSP. Additionally, Brea Fire Station 3 is within one mile east of the BSCP Area located at 2600 East Santa Fe Road. By directing growth to this central, highly accessible location, the BCSP reinforces an urban development pattern where emergency response can be provided efficiently without requiring expansion of the fire station network.

Although the BCSP anticipates increased residential density, commercial intensification, and mixed-use redevelopment within its boundaries which would result in an increase in residents and employees in the City, all such development would occur in areas that are already served by fire protection infrastructure. Redevelopment within the BCSP would not create new service areas, extend the City into remote hillside regions, or increase development in the wildland urban interface. Instead, growth would occur in a compact area characterized by short travel distances, grid-based street patterns, and significant existing infrastructure. Any site-specific improvements needed to support new development such as internal access, fire flow enhancements, sprinkler requirements, or hydrant placement would be implemented as part of individual project approvals and governed by the California Building and Fire Codes and the City's development review process. In addition, future development would be required to contribute to the Developer Impact

Fees which include Dispatch Fees and Fire Impact Fees to offset costs for future fire protection infrastructure to include facilities, vehicles, and equipment.

Given its highly urbanized setting, strong existing emergency service coverage, and compliance with regulatory requirements, impacts related to fire protection facilities under the BCSP would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.1.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to fire protection services that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

Cumulative Threshold PS-a(i): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Focused General Plan and Brea Core Specific Plan

The area considered for cumulative analysis for fire protection services is the Brea Fire Department's service area, Orange County Fire Authority service area, and other fire departments' service areas surrounding Brea. A cumulative impact to fire protection services would occur if growth in the City's service area and the surrounding region requires physical expansion of facilities, such as construction of new fire facilities that would result in adverse physical impacts.

Cumulative development in Brea and the surrounding region would incrementally increase regional demand for fire suppression and emergency medical services. When combined, these development patterns could affect fire protection demands within these serve areas affecting call volumes, response performance, staffing needs, apparatus availability, and facility utilization. However, such increases do not constitute a physical environmental impact unless they require the construction of new or expanded fire protection facilities with associated physical effects.

The Brea Fire Department participates in mutual and automatic aid systems that further buffer cumulative service pressures by sharing resources during peak or emergency conditions.

Although cumulative development could increase service demand across the region, no cumulative project or regional growth pattern has been identified that would create a deficiency in fire service coverage in Brea or necessitate new fire stations to maintain the City's service ratios or response times. While future demands could eventually trigger the need for new or expanded facilities, the Focused GPU is a planning document with assumed buildout in 2050, and does not itself trigger the immediate need for new fire stations or major fire protection improvements. Furthermore, the City periodically evaluates fire service needs and various development fees to ensure that adequate service is provided and that new development contributes its fair share toward the facilities, staffing, and apparatus needed to support Citywide growth. These operational adjustments would not result in physical environmental impacts. Given the incremental nature of anticipated growth and the speculative need for new or expanded fire facilities, it is assumed that additional environmental review would be required if such facilities are proposed.

Future development in the City would have to comply with California Fire and Building Codes, California Health and Safety Code, the City of Brea's City Code and Brea Fire Code; pay development impact fees; and complete the review and obtain approval of building plans, emergency access plans, and fire master plan by the fire department to reduce impacts. Individual projects would be reviewed by the City and Brea Fire Department to determine the specific requirements applicable to the development and ensure compliance with these requirements. The Brea Fire Department participates in mutual and automatic aid systems that further buffer cumulative service pressures by sharing resources during peak or emergency conditions. Brea Fire Department and other fire department and agencies are expected to continue to share resources, thus reducing the need for each fire department to expand or construct new fire protection facilities would be reduced. For these reasons, the Proposed Project, when combined with other projected development, would result less than cumulatively considerable impacts.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.1.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold PS-a(i) would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP PS-1 through PPP PS-6, PPP T-1, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.12.1.7 Mitigation Measures

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

4.12.1.8 Level of Significance After Mitigation

Not applicable.

4.12.2 Police Protection

4.12.2.1 Environmental Setting

Regulatory Background

Local

2003 Brea General Plan

The 2003 Brea General Plan, Public Safety Element, includes goals and policies aimed at ensuring public safety by protecting the community from hazards. Applicable policies include:

- **Policy PS-1.1.** Work with the Police Department to determine and meet community needs for law enforcement.
- **Policy PS-1.2.** Provide up-to-date technology to the Brea Police and Fire Department.
- **Policy PS-1.3.** Continue to maintain and develop a community-based police strategy compatible with the needs and size of the community.
- **Policy PS-1.4.** Work with the Fire Department to determine and meet community needs for fire protection and related emergency services. Ensure that sufficient stations, personnel, and equipment are provided to meet growth needs in the City.
- **Policy PS-1.5.** Maintain a maximum 4- to 6-minute emergency response time for fire safety services. Maintain a 3- to 5-minute response time from emergency police response services. Require that all new development be able to meet established standards for such response.
- **Policy PS-1.6.** Impose special conditions as needed on development projects to ensure that adequate fire protection measures are in place and maintained.
- **Policy PS-1.7.** Incorporate the tenets of Community Oriented Policing into the design of crime prevention and enforcement programs.
- **Policy PS-1.8.** Use technology to improve crime prevention efforts.

Emergency Response Planning

The City has an active emergency preparedness program coordinated by a professional emergency manager. Public programs available range from those provided upon the request of an organization or group, to the more structured Brea Community Emergency Response Team classes, offered periodically. The five key elements of the City's Emergency Preparedness Program are:

- Development and maintenance of the City's Emergency Response Plan.
- Development and maintenance of the City's Emergency Operations Center.

- Coordination of preparedness, training, and exercises for city staff to be sure they are ready to respond to any emergency.
- Public education and outreach to the residents and businesses of Brea.
- Funding recovery following disasters (City of Brea 2019).

Existing Conditions

Law enforcement and police protection services are provided by the Brea Police Department headquartered at the Brea Civic & Cultural Center. Brea Police Department is divided into the uniform division and support services division, directed by two captains (Brea Police Department 2025). These two divisions are comprised of a K-9 unit (consisting of two dogs), communications center, crime suppression unit, several investigation units, patrol unit, professional standards unit, S.W.A.T. unit, threat management unit, and traffic unit (Brea Police Department 2025). The existing staffing levels are 64 full-time sworn officers, 29 full-time nonsworn employees, and 19 part-time nonsworn employees. There are over 40 patrol officers in the uniform division, and their duties include:

- Response to emergency, in-progress crimes.
- Conduct on-scene investigations, including fingerprinting, photography, interviewing, and interrogation.
- Write crime reports documenting incidents.
- Arrest and book criminal offenders.
- Stop traffic violators and warn or cite the driver.
- Patrol their assigned area, checking residential and business areas for illegal activity.

Brea Police Department Communications Center includes a communications supervisor, four senior dispatchers, six full-time dispatchers, and nine part-time dispatchers; it operates 365 days a year, 24 hours a day (Brea Police Department 2025). Calls for service are prioritized into several categories, with emergency calls being the most important; the department's average response time is 3 minutes and 16 seconds, as of June 2023 (Brea Police Department 2025).

Police protection in the SOI is provided by the Orange County Sheriff's Department.

Response Times

Brea Police Department average emergency response time as of June 2023 was 3 minutes and 16 seconds. All emergency calls are handled with a very similar protocol. All 911 calls are received by the Brea Police Department communications (dispatch) team. Varying scenarios include:

- **Police Calls –** Police dispatch will mobilize police units to respond to the call.
- **Fire/Medical Aid Calls –** If a 911 fire or medical aid call comes in, police dispatch will assess the type of call and will connect with fire dispatch (Metro Net Fire Dispatch is the emergency communications center that dispatches fire/medical services throughout Brea. They are located in Anaheim). Police units are typically sent out to ensure the area is secure.

Dispatch Impact Fees

Ordinance No. 968 authorized the City of Brea to establish dispatch impact fees as necessary for upgrading police and fire dispatch systems, thus ensuring that new development is provided with appropriate public safety services. The fees are updated as needed. The current fees are established by Resolution No. 2024-013, adopted in April 2024, and became effective on July 1, 2025 (Brea 2025a).

4.12.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Project would have a significant effect on public services if it would:

- 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:
  - **Threshold PS-a(ii):** Police protection

4.12.2.3 Plans, Programs, and Policies

Compliance measures are regulations imposed uniformly by the approving agency based on the proposed action taken and are required of the Project to reduce its potential environmental effects. Because these features are standard requirements, they do not constitute mitigation measures. The following measures are existing PPP that apply to the Project and will help to reduce and avoid potential impacts related to police services:

PPP PS-8 As part of the project review process, the Brea Police Department will recommend the following project design features to improve security on project sites.

- Provide individual mailboxes rather than gang mailboxes to reduce mail theft vulnerability.
- All common areas should be properly lit to increase surveillance and discourage unwanted activities.
- All trail/park areas should include connectivity for potential future surveillance camera locations.
- Provide the maximum amount of off-street.

PPP PS-9 The project applicant will consult with the Brea Police Department on street addressing and signage, particularly in high density areas.

PPP PS-10 The project applicant is required to pay dispatch impact fees and all other development impact and/or special assessment fees as deemed applicable by the City of Brea.

PPP PS-2 and PPP TRA-2 will also apply.

The new or updated general plan goals and policies related to public services are included as Appendix C to the PEIR.

4.12.2.4 Environmental Impacts

The following sections address various potential impacts relating to police services that could result from implementation of the Proposed Project.

Threshold PS-a(ii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Analysis

Focused General Plan Update

Future development facilitated by the Focused GPU could result in additional residents and businesses in the City, thereby increasing demand for additional police protection services. Future development within the SOI pursuant to the Focused GPU would need to be annexed and the Brea Police Department would be responsible for police protection. To serve the additional population, the Brea Police Department may need additional facilities, officers, and equipment to maintain adequate levels of police protection and response performance. Residential and non-residential development under the Focused GPU would occur incrementally over an approximately 25-year planning horizon, with full buildout anticipated by 2050. As such, the environmental effects associated with the provision of new or expanded police facilities are speculative at this programmatic stage because the specific need, timing, location, and design of any future police facilities cannot be determined at this time. The Focused GPU does not propose, authorize, or identify sites for new or expanded police protection facilities. Although the Focused GPU would accommodate growth within the City, the need for additional police facilities would depend on multiple factors, including, but not limited to, the location and condition of existing police facilities, staffing and equipment levels, response times at the time of development, and the geographic distribution of future growth. It is anticipated that any future expansion or construction of police facilities would occur within areas already developed with urban uses and within land use designations that allow such facilities. Accordingly, the construction and operation of police facilities would not be expected to result in substantial adverse physical impacts beyond those associated with other permitted non-residential urban uses. New development consistent with the Focused GPU would be subject to Dispatch Impact Fees, which contribute to the Brea Police Department's ability to maintain appropriate service levels.

Furthermore, as discussed in Section 4.12.1.4 for fire protection and emergency services, policies and actions identified as part of Goal PS-6 Emergency Management, of the Focused GPU Public Safety Element would help reduce police services impacts (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions). In particular the following policies and action are related to police services:

- **Policy PS-6.3:** Communication. Maintain proper protocols among all emergency service providers.
- **Policy PS-6.4:** Education. Prepare the community for efficient response and evacuation.
- **Policy PS-6.5:** Automatic and Mutual Aid. Participate in aid agreements with adjacent providers.
- **Policy PS-6.6:** Evacuation Routes. Work with Fire/Police to define standards and assessment ranges.
- **Action PS-6e:** Prepare five-year strategic plans for both Fire and Police Departments.
- **Action PS-6f:** Update technical studies for Fire Department five-year plans.
- **Action PS-6g:** Evaluate public safety impacts of new development using standard methodologies.
- **Action PS-6h:** Publish a Public Safety Impact Methodology Manual.
- **Action PS-6i:** Adopt Department Service Level Objectives (SLOs).
- **Action PS-6j:** Provide annual reports on adopted SLOs.
- **Action PS-6k:** Require phasing for major developments to prevent response degradation.
- **Action PS-6l:** Require fair-share contributions to mitigate public safety impacts.
- **Action PS-6m:** Maintain consistency between strategic plans and the General Plan/CIP.
- **Action PS-6n:** Maintain standardized public safety data and publish an annual scorecard.

These include actions requiring periodic strategic planning, technical studies, service level objective adoption and reporting, development phasing, and fair-share contribution frameworks. Collectively, these policies provide an adaptive planning and implementation framework to ensure that police services are evaluated and addressed as development occurs, without committing to specific facilities or improvements at this time.

Any future construction or expansion of police facilities would be subject to discretionary approval and project-level review under the California Environmental Quality Act (CEQA) and would be required to comply with all applicable federal, State, and local laws and regulations. With adherence to the City's development review process and applicable regulatory requirements, impacts related to the provision of new or physically altered police protection facilities would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The Brea Core Specific Plan (BCSP) focuses on the downtown and central core of the City, development in the BCSP area is planned within the jurisdiction and coverage of existing BPD facilities. The plan does not involve substantial expansion into areas currently lacking police service coverage. There are Brea Police Department and Annex facilities within the BSCP area. Brea Police Department is located at the Brea Civic & Cultural Center - 1 Civic Center Circle, and the Downtown Annex is located at 210 West Birch Street. As discussed under the above Focused GPU, the BCSP would occur over an approximately 25-year planning horizon, with full buildout anticipated by 2050. As such, the environmental effects associated with the provision of new or expanded police facilities are speculative at this programmatic stage because the specific need, timing, location, and design of any future police facilities cannot be determined at this time. Although the BCSP would result in additional housing and businesses, it does not propose, authorize, or identify sites for new or expanded police protection facilities. It is anticipated that any future expansion or construction of police facilities would occur within areas already developed with urban uses and within land use designations that allow such facilities. Accordingly, the construction and operation of police facilities would not be expected to result in substantial adverse physical impacts beyond those associated with other permitted non-residential urban uses. As discussed under Focused GPU analysis above, the proposed Focused GPU goals, policies, and actions include periodic strategic planning, technical studies, service level objective adoption and reporting, development phasing, and fair-share contribution frameworks to ensure that police services are evaluated and addressed as development occurs, without committing to specific facilities or improvements at this time. Furthermore, any future construction or expansion of police facilities would be subject to discretionary approval and project-level review under CEQA and would be required to comply with all applicable federal, State, and local laws and regulations, including payment of Dispatch Impact Fees. With adherence to the City's development review process and applicable regulatory requirements, impacts related to the provision of new or physically altered police protection facilities would be less than significant.

Future development consistent with the BCSP would not result in a substantial adverse physical impact related to the need for police protection services, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.2.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to police services that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

Cumulative Threshold PS-a(ii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Focused General Plan and Brea Core Specific Plan

The area considered for cumulative analysis for police protection services is the City. Most cumulative growth occurs within already urbanized areas and is generally served by existing police resources and mutual aid agreements. Cumulative impacts to police protection services would occur if growth in the service area would increase overall police services demands for the Brea Police Department which would require physical expansion of facilities, such as construction of new police facilities that would result in adverse physical environmental impacts. Buildout of the Proposed Project along with other City development would occur over an extended period of time. As such, the environmental effects associated with the provision of new or expanded police facilities are speculative at this programmatic stage because the specific need, timing, location, and design of any future police facilities cannot be determined at this time. The Focused GPU does not propose, authorize, or identify sites for new or expanded police protection facilities. Although new or altered police facilities could be needed in the future, construction of such a facility does not typically involve large scale development that could potentially result in substantial adverse physical impacts beyond those associated with other permitted non-residential urban uses. Additionally, future construction or expansion of police facilities would be subject to discretionary approval and project-level review under CEQA and would be required to comply with all applicable federal, State, and local laws and regulations.

As discussed in Section 4.12.2.4 for individual impact, the Focused GPU Public Safety Element includes actions associated with Goal PS-6, Emergency Management, that require periodic strategic planning, technical studies, service level objective adoption and reporting, development phasing, and fair-share contribution frameworks, which provide an adaptive planning and implementation framework to ensure that police services are evaluated and addressed as development occurs, without committing to specific facilities or improvements at this time.

Therefore, with adherence to the City's development review process and applicable regulatory requirements, impacts related to the provision of new or physically altered police protection facilities would be less than significant individually, would not have a cumulatively considerable contribution to a cumulative impact related to police protection services. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.2.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold PS-a(ii) would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP PS-8 through PPP PS-10, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.12.2.7 Mitigation Measures

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

4.12.2.8 Level of Significance After Mitigation

Not applicable.

4.12.3 School Services

4.12.3.1 Environmental Setting

Regulatory Background

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population

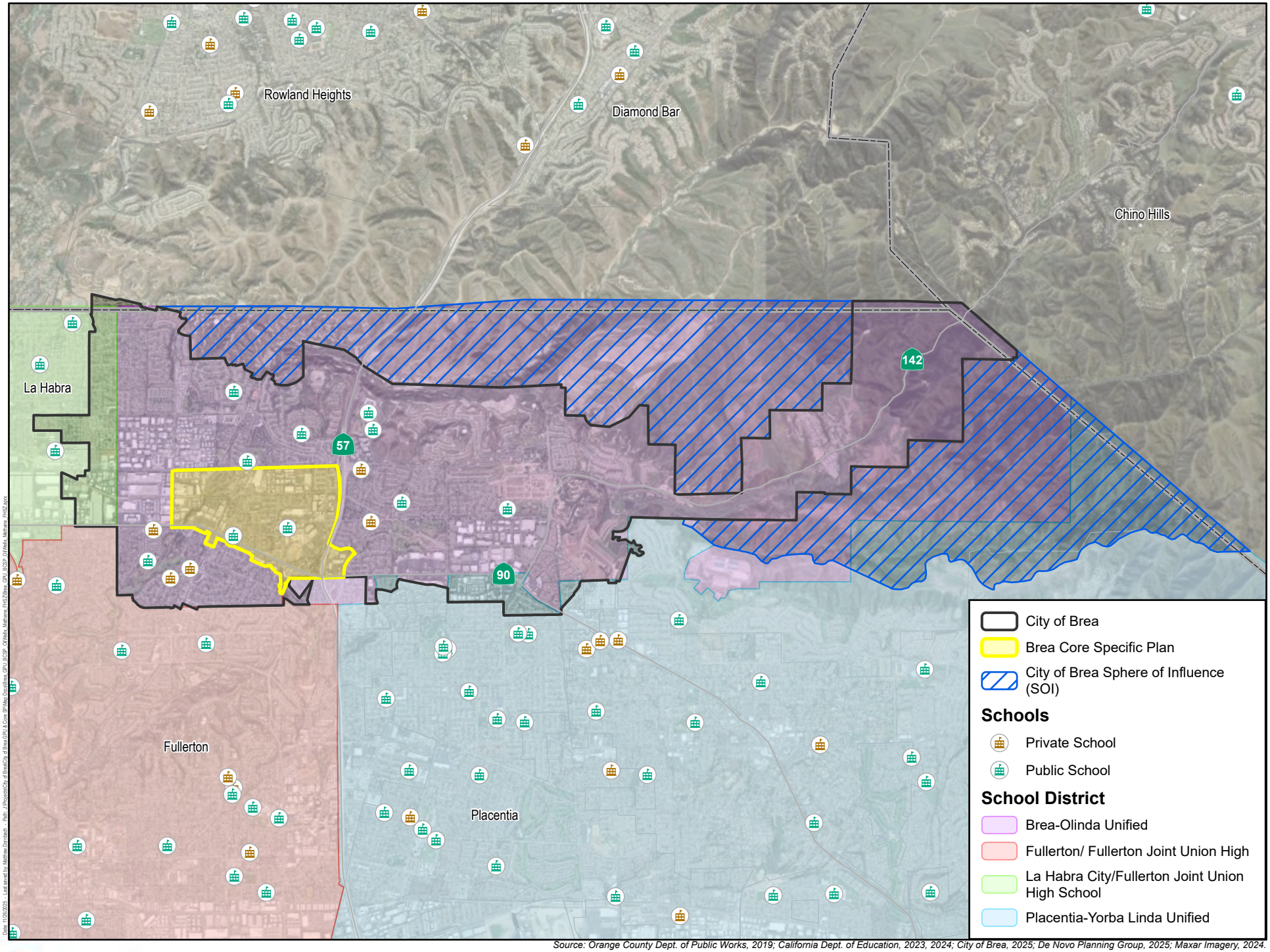
increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

Under this legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the State provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply if the State runs out of bond funds, allowing the governing school district to impose on the developer 100 percent of the cost of school facility or mitigation minus any local dedicated school monies.

Existing Conditions

Enrollment and Capacity

The City of Brea is primarily served by the Brea Olinda Unified School District (BOUSD) which is bounded on the north by the Orange County and Los Angeles County lines, on the east by San Bernardino and Riverside counties, on the west by Puente Avenue, and on the South by the City of Fullerton. Figure 4.12-1, School District Boundaries Map and Schools, illustrates the areas within the Project area that are within the BOUSD service area. The BOUSD consists of six elementary schools, one junior high school, one high school, one alternative high school, and one online academy and serves over 5,700 students (Table 4.12-2, BOUSD 2024-25 Enrollment; BOUSD 2025). Also in the city are several pre-schools, two Christian schools, and a Catholic school with classes for children from K-8.



Source: Orange County Dept. of Public Works, 2019; California Dept. of Education, 2023, 2024; City of Brea, 2025; De Novo Planning Group, 2025; Maxar Imagery, 2024.

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Figure 4.12-1
School District Boundaries Map and Schools

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Table 4.12-2. BOUSD 2024-25 Enrollment

School Level	2020-21	2021-22	2022-23	2023-24	2024-25
Arovista Elementary	409	385	391	412	460
Brea Canyon High (Continuation)	80	71	91	55	41
Brea Country Hills Elementary	528	509	516	543	498
Brea Junior High	929	893	907	919	921
Brea Olinda High	1,758	1,729	1,681	1,710	1,676
Brea Online Academy	217	118	23	12	13
Falcon Academy of Science and Technology	481	520	527	557	544
Laurel Elementary Magnet School of Innovation and Career Exploration	423	427	447	473	434
Mariposa Elementary	550	579	557	542	504
Olinda Elementary	601	635	671	668	649
Nonpublic, Nonsectarian Schools	14	n/a	n/a	2	13
BOUSD Total	5,990	5,866	5,811	5,895	5,753

Source: California Department of Education 2025.

Students living west of Puente Street to the Brea city limits are served by the La Habra City School District (K–8) and the Fullerton Joint Union High School District (9–12). Students living south of Imperial Highway and east of Placentia Avenue are served by the Placentia–Yorba Linda Unified School District (K–12; Brea 2025c). Sonora High School and Ladera Palma Elementary School, which are within the Fullerton Joint Union High School District and the La Habra City School District, respectively, are located along the western edge of, but outside, the City of Brea's boundaries.

Development Impact Fees

BOUSD has adopted a fee program pursuant to SB 50 that levies statutory school impact fees per residential building square footage. These fees are regularly updated and the current adopted fees based on Resolution 24-08 are as follows (BOUSD 2024):

- Residential: $5.17/square foot
- Commercial: $0.84/square foot

La Habra City School District, Fullerton Joint Union High School District, and the Placentia-Yorba Linda Unified School District also have adopted school impact fees pursuant to SB 50.

4.12.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the project would have a significant impact on public services if it would:

- 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:

- **Threshold PS-a(iii):** Schools.

4.12.3.3 Plans, Programs, and Policies

PPP PS-11 **Development Impact Fees.** Pursuant to Assembly Bill 2926, new development is required to pay development impact fees to assist in providing school facilities to serve students generated by new development.

PPP PS-12 **School Facilities Impact Fee.** Pursuant to Senate Bill 50, new development is required to offset the costs associated with increasing school capacity, where the funds collected go to acquiring school sites, constructing new school facilities, and modernizing existing school facilities.

4.12.3.4 Environmental Impacts

Threshold PS-a(iii)c: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Analysis

Focused General Plan Update

The City is primarily served by the BOUSD. Residents living west of Puente to the Brea city limits are served by Fullerton Joint Union High School District and La Habra City School District and residents south of Imperial Highway and east of Placentia Avenue are served by the Placentia-Yorba Linda Unified School. Future development consistent with the Focused GPU would result in an increase in residents. The student population growth from future development is anticipated to incrementally increase the demand for school facilities/services in the current districts that serve the City. However, the increased demand for school facilities would be accommodated through the payment of School District Fees. The funding program established by SB 50 sets forth a State school facilities construction program that includes restrictions on a local jurisdiction's ability to demand mitigation of a project's impacts on school facilities in excess of fees in Education Code, Section 17620. Payment of impact fees as adopted by BOUSD and in compliance with SB 50 would reduce impacts to an acceptable level. If any future school facilities would be required those facilities would undergo their own CEQA review by individual school districts prior to approval. Therefore, future development consistent with the Focused GPU would not result in a substantial adverse physical impact related to the need for schools, and impacts would be less than significant.

Brea Core Specific Plan

BOUSD serves the BCSP area. Most of the BCSP area falls within the Laurel Elementary School attendance boundary, and Laurel Elementary School is located within the BCSP limits. The BCSP area is also within the attendance boundaries of Arovista Elementary School and the Falcon Academy of Science & Technology, although both of these schools are located outside the BCSP area. BOUSD has one junior high school and one high school, both of which are also located outside the BCSP area.

Student population growth from future development within the BCSP area is anticipated to incrementally increase the demand for school facilities and services. However, this increased demand would be accommodated through the payment of School District Fees. SB 50 establishes a State school facilities funding program that limits a local jurisdiction's ability to require mitigation for a project's impacts on school facilities beyond the statutory fees identified in Education Code Section 17620. Payment of impact fees adopted by BOUSD, in compliance with SB 50, would reduce impacts to an acceptable level (see Focused GPU analysis).

Therefore, future development consistent with the BCSP would not result in substantial adverse physical impacts related to the need for new or expanded school facilities, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.3.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to school services that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

Cumulative Threshold PS-a(iii): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Focused General Plan Update and Brea Core Specific Plan

The area considered for cumulative analysis is the service areas of school districts serving the City. Most new residential growth occurs within already urbanized areas, where school districts have ongoing facility planning and capital improvement programs. Cumulative development projects that involve residential development would increase the public-school population in the region and could require the construction or expansion of school facilities so that adequate service ratios are maintained, depending on various factors including long-term enrollment projections. An increase in student population could require the construction or expansion of school facilities, which could result in adverse environmental impacts. As discussed above, under State law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The program under SB 50 has been found by the legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities." The fees authorized for collection by BOUSD are therefore deemed full and adequate mitigation of impacts on those districts. Furthermore, cumulative school projects require discretionary actions and would be required to demonstrate compliance with CEQA prior to project approval. The Proposed Project would not combine with areawide growth to result in cumulatively considerable impacts to school services.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.3.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold PS-a(iii) would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP PS-11, PPP PS-12, and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.12.3.7 Mitigation Measures

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

4.12.3.8 Level of Significance After Mitigation

Not applicable.

4.12.4 Parks

4.12.4.1 Environmental Setting

Regulatory Background

Local

City of Brea City Code

According to Section 2.24.020 of Chapter 2.24, Parks, Recreation, and Human Services Commission, the commission shall:

- Coordinate all of the recreation, leisure time, and cultural activities of the city.
- Provide for the establishment and maintenance of sound recreation and parks programs.
- Ensure the efficient operation of all recreation and parks facilities within the city.
- Encourage a sound and well-rounded program of activities to service the recreational, park, cultural, leisure time and other needs of people within the city.

Chapter 18.64, Dedications and Reservations, establishes the rules that require developers to dedicate land, reserve areas, or pay fees to ensure that new subdivisions provide adequate public infrastructure and community amenities. Its purpose is to implement the State Subdivision Map Act and ensure that growth occurs in an orderly, well-planned way by securing needed streets, utilities, parks, open space, and other public facilities. In short, it ensures that new development contributes its fair share to the infrastructure and services needed to protect public health, safety, and overall community quality of life.

2003 Brea General Plan

The goals and policies of the Brea General Plan include providing a variety of parks and recreation facilities that meet the diverse needs of the community, protecting and preserving existing parks and recreation facilities, and maximizing use of open space areas capable of supporting park-type activities.

Existing Conditions

Brea maintains parks and recreation facilities within its boundaries providing varied leisure needs to the community. The Brea Community Services Department coordinates programing within parks while the facilities themselves are maintained by the Brea Public Works Department. The City's park system consists of public neighborhood parks, community parks, regional parks, and school parks that have joint use agreements with the Brea Olinda Unified School District for shared community benefits (Table 4.12-3, City of Brea Park Facilities).

Brea has 22 parks and recreation facilities, including mini or pocket parks, a dog park, neighborhood parks, school parks, community parks, regional parks, Carbon Canyon Regional

Park, Ted Craig Regional Park, hiking trails, skate park, and two golf courses (Brea 2025d). In addition, Chino Hills State Park encompasses 11,770 acres in the counties of Orange, Riverside, and San Bernardino and occupies approximately 16 percent of Brea's total Project area.

An approximately 3,400-acre area of Chino Hills State Park, including natural wilderness area with hiking, biking, and equestrian trails, is in Brea and its SOI. Passive open space and park areas account for 5 percent of the land within the City limits.

Table 4.12-3. City of Brea Park Facilities

Park Name	Location	Amenities	Size
City-Owned/Maintained Facilities			
Mini or Pocket Parks			
Woodcrest Park	1630 Wardman Drive	Barbeques, Children's play area, and picnic tables.	0.5 acres
Neighborhood Parks			
Arovista Park	500 West Imperial Highway (Imperial Highway at Berry Street)	Play areas, barbecues, picnic tables, restrooms, ball diamond, soccer fields, volleyball court, amphitheater, concession stand, football field and basketball courts.	14.84 acres
City Hall Park	401 South Brea Boulevard	Olympic-size swimming pool (Brea Plunge), restrooms, barbecues, play areas, basketball courts and gazebo.	4.47 acres
Greenbriar Park	Greenbriar Road and Associate Road	Barbecues, play areas, picnic tables and restrooms.	3.5 acres
Tamarack Park	520 North Tamarack Avenue	Restrooms, barbecues, play areas, ball diamond, soccer fields, concession stand, football field and basketball courts.	5.6 acres
Founder's Park	777 Skyler Way	Tot lot, climbing wall, basketball court, 2 tennis courts, picnic area and restrooms.	4 acres
Community Parks			
Tri-City Park	North Kraemer Boulevard at Golden Avenue	Restrooms, barbecues, play areas, picnic tables, bicycle trails, lake and fishing.	40.0 acres

Table 4.12-3. City of Brea Park Facilities

Park Name	Location	Amenities	Size
Non-City-Owned/Maintained Regional Parks and Facilities			
Regional Parks			
Carbon Canyon Regional Park	4442 Carbon Canyon Road	Tennis courts, Children's play area, volleyball, ball diamond, multipurpose fields, hiking and biking trails, guided nature tours, picnic tables, and fishing.	131 acres
Ted Craig Regional Park	3300 State College Boulevard	Restrooms, barbecues, play areas, picnic tables, ball diamonds, volley ball, racquetball courts, amphitheater, bicycle trails, basketball courts and fishing.	129 acres
School Parks (Joint Use Sites)			
Brea Jr. High School Park	400 North Brea Boulevard	Play areas, ball diamonds, soccer fields, tennis courts, volleyball, concession stand, football field and basketball courts.	13.06 acres
Country Hills Park	180 North Associated Road	Restrooms, barbecues, play areas, picnic tables, ball diamonds, soccer fields, tennis courts, concession stand and football field.	6.21 acres
Lagos de Moreno Playground/Laurel Elementary School Playground	200 South Flower Avenue	Children's playground and open lawn area.	1.5 acres
Other Recreation			
Chino Hills State Park	Partially in Orange, Riverside, and San Bernadino Counties	Trails for hikers, mountain bikers, and equestrians, camping, and 13,000 acres of wilderness.	14,000 acres
Birch Hills Golf Course	2250 East Birch Street	18-hole executive golf course with new greens and tees and a lighted driving range.	3,100-yard course
Brea Creek Municipal Golf Course	501 West Fir Street	Nine-hole course with driving range. Rental electric and hand carts and clubs are available. Reservations for the course can be made up to one week in advance.	25.82 acres
Brea Sports Park	3333 East Birch Street	Ball fields, walking trail, children's play area and picnic area.	20 acres

Table 4.12-3. City of Brea Park Facilities

Park Name	Location	Amenities	Size
Olinda Oil Museum and Trail	4025 East Santa Fe Road	Historic museum and Olinda hiking trail, working oil well drilled in 1898, outdoor displays, restrooms, parking lot and picnic area.	1.9 acres
Olinda Ranch Park	4055 Carbon Canyon Road	Children's playground, basketball courts, day use sports fields, picnic area and restrooms.	5 acres
Wildcatters Dog Park	3450 East Santa Fe Road	Separate areas for small dogs (less than 25 pounds) and large dogs (over 25 pounds), benches, drinking fountains with attached dog bowls, picnic tables, double-entry gates, grass turf, dog waste cleanup stations	0.3 acres
Brea Skate Park	500 West Elm Street	Skate park featuring a bowl for tricks, plus stairs and a playground.	0.4 acres
The Tracks at Brea	Trailheads with parking available at Arovista Park (500 West Imperial Highway) and on North Brea Boulevard	Trailheads with parking available at Arovista Park (500 West Imperial Highway) and on North Brea Boulevard.	Approximately 4 miles

Source: City of Brea 2025d.

Development Impact Fees

Park Development Fees provide for the development of park and recreational facilities through subdivision regulations, in an area where the need for residential use, shall, as a condition to the approval of a tentative map, parcel map, planned community, land development or real estate development, dedicate lands or pay fees in lieu thereof, or a combination of both, for neighborhood and community park or recreational purposes. In lieu fees shall be paid to the city prior to issuance of building permits or recordation of subdivision map. (Brea 2025e):

- Residential (Fee per Dwelling Unit)
  - Single Family: $9,818
  - Two Family: $9,818
  - Multifamily: $5,611
  - Mobile Home: $4,769

4.12.4.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the project would have a significant impact on public services if it would:

- 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:
  - **Threshold PS-a(iv):** Parks.

4.12.4.3 Plans, Programs, and Policies

PPP PS-13 **Park Development Fees.** The project is required to comply with Brea City Code Section 18.64.080 that establishes the subdivision regulations for the provision of park and recreational facilities through land dedication, installation of improvements, payment of in-lieu fee thereof, or a combination. Where applicable, new development is required to fund park development and improvements through the payment of Park Development Fees.

4.12.4.4 Environmental Impacts

Threshold PS-a(iv): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Analysis

Focused General Plan Update

Future development consistent with the Focused GPU could result in an increase in demand for parks and recreation facilities. Each jurisdiction determines the appropriate park standard based on the guidance provided by Section 666477 of the California Government Code, commonly referred to as the Quimby Act. The City's standard of parkland is 5 acres of parkland per 1,000 residents. Under project conditions, population within the City would reach approximately 67,647 people; thus, under project conditions, the City would have a ratio of approximately 4.6 acres of parkland per 1,000 people.

As described above, the Quimby Act establishes a funding mechanism for parkland acquisition for all local jurisdictions. Future development in accordance with the Focused GPU would be required to pay Park Development Fees. These fees provide for the development of park and recreational facilities and would assist the City in achieving the parkland standard of 5.0 acres per 1,000

residents. Therefore, future projects would be required to meet the City's standards and overall would result in continuing to balance the ratio of parkland per City residents. Given that the Focused GPU emphasizes redevelopment within already urbanized areas, the majority of park improvements would involve upgrades or expansions of existing facilities rather than construction of entirely new parks on undeveloped land. In addition, any new park facility necessitated and undertaken to meet the growth demands from the buildout of the Focused GPU would undergo its own CEQA review prior to approval. Therefore, future development consistent with the Focused GPU would not result in a substantial adverse physical impact related to the need for parks, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Lagos De Moreno Park located at 200 S. Flower Avenue is located within the BCSP area. Additionally, Tamarack Park located at 520 N. Tamarack Avenue, Craig Regional Park located at 3300 State College Boulevard, and City Hall Park located at 401 S. Brea Boulevard are directly adjacent to the BCSP boundary. The BCSP focuses on the downtown and central core, where higher-density residential development may slightly increase the demand for parks and recreational amenities. Due to the urban nature of the BCSP area, new residential units are likely to generate a modest number of additional park users. The BCSP includes policies for improving existing parks and providing recreational programming within the downtown area. These enhancements would typically involve minor construction or renovation at existing sites rather than development of entirely new parklands. As a result, while the BCSP may require modest modifications to facilities, such activities would not produce substantial environmental impacts.

See analysis for Focused GPU. Future development in accordance with the BCSP would be required to pay Park Development Fees. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.4.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to parks that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

Cumulative Threshold PS-a(iv): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Focused General Plan Update and Brea Core Specific Plan

The area of cumulative impacts considered is the city. Cumulative development projects would increase the demand for parks which has the potential to result in an adverse impact on the environment. However, the City's ongoing park planning, Capital Improvement Program, and policies for facility expansion and enhancement are designed to accommodate these increases. Most new development occurs within already urbanized areas where expansions are possible without major environmental impacts. Future projects would be required to meet the City's standards to balance the ratio of parkland per City residents and would be required to analyze the physical impacts related to the provision of new or physically altered park facilities if new parks would be required. Impacts would be less than significant, and not cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.4.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold PS-a(iv) would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP PS-13 and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.12.4.7 Mitigation Measures

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

4.12.4.8 Level of Significance After Mitigation

Not applicable.

4.12.5 Library Services

4.12.5.1 Environmental Setting

Regulatory Background

Local

2003 Brea General Plan

While the Focused GPU will replace or reorganize these policies, they remain applicable until adoption of the Brea 2050 General Plan.

The City of Brea General Plan, Chapter 5, Community Services Element, includes goals and policies for human services, recreation, educational services, library services, and cultural-arts programs in the city. Applicable policies include:

- **Goal CS-4:** Provide library resources that meet the educational, cultural, civic, business, and life-long learning needs of all residents. Retain a local library system that is community-oriented, provides knowledgeable, service-oriented staff, and offers access to information, books, and other materials in a variety of formats that use contemporary technology:
  - **Policy CS-4.1.** Encourage the County to develop programs and services for adults, children, and new readers that meet future needs.
  - **Policy CS-4.2.** Work with library staff to assess, select, organize, and maintain collections of materials and information sources of value to and desired by the community.
  - **Policy CS-4.3.** Work with library staff to maintain technological services that meet the needs of residents, as well as reader advisory, reference and referral services, responsive to user needs.
  - **Policy CS-4.4.** Explore funding opportunities for the City to expand the existing County branch library and/or operate a local, independent library.

Existing Conditions

Brea Branch Library

The Brea Branch Library is part of the Orange County Public Library (OCPL) community library network, which includes 33 branches throughout Orange County. OCPL is a dependent special district governed by the Orange County Board of Supervisors. It is the third largest local library system in California.

The Brea Branch Library is located at 1 Civic Center Circle and offers an assortment of materials and programs including books, newspapers, magazines, videos and DVDs, music CDs, audiobooks, and digital services such as ebooks, audiobooks, and subscription databases (Brea 2025b). Programming includes activities for all ages such as story times, craft programs, book

clubs, individualized computer instruction, a writers group, and the annual Summer Reading Program. The library benefits with support and advocacy from the Friends of the Brea Library, an independent, nonprofit organization.

4.12.5.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the project would have a significant impact on public services if it would:

- 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:
  - **Threshold PS-a(v):** Other public facilities (e.g., library services).

4.12.5.3 Plans, Programs, and Policies

There are no existing plans, programs, and policies related to library services applicable to the Proposed Project.

4.12.5.4 Environmental Impacts

Threshold PS-a(v): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Impact Analysis

Focused General Plan Update

Development consistent with Focused GPU is anticipated to increase the city's population by 19,062 people consequently increasing the number of potential library users. Residents of Orange County can use any library in the OCPL system if they are a member; this analysis focuses on OCPL libraries in the City of Brea. Orange County's service standard is 0.2 square foot of facilities and 1.5 book volumes per capita for residential communities. Therefore, the increase in population would require additional library space of 3,812.4 square feet and 28,593 book volumes. Future development consistent with the Focused GPU would be required to pay OCPL impact fees prior to the issuance of building permits to offset the costs of providing additional resources to new residents. However, any new library facilities necessitated would undergo their own CEQA review prior to approval. Therefore, future development consistent with the Focused GPU would not result in a substantial adverse physical impact related to the need for other public facilities including libraries, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

See analysis for Focused GPU. Population increase for the Focused GPU is inclusive of the population increase associated with development consistent with the BCSP. Future development in accordance with the BCSP would be required to library impact fees. Future development consistent with the BCSP would not result in a substantial adverse physical impact related to the need for other public facilities including libraries, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.5.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to library services that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

Threshold PS-a(v): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Focused General Plan Update and Brea Core Specific Plan

The area considered for cumulative analysis is the service area for other public facilities in the City, including the OCPL. Cumulative development projects that involve residential development would increase the population in the region and could require the construction or expansion of library facilities so that adequate service ratios are maintained. This increase in population could require the construction or expansion of library facilities, which could result in adverse environmental impacts. The City's planning and capital improvement strategies provide mechanisms to expand or upgrade library facilities within existing urbanized areas, minimizing environmental impacts. As with the Proposed Project, other development projects would also contribute to the property tax revenues that would fund the County's library system and would be required to pay library impact fees to offset its fair-share of the cost of providing additional library

resources within the OCPL system. New and/or expanded libraries in the City would be subject to environmental review and mitigation pursuant to CEQA. Impacts would be less than significant, and not cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.12.5.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold PS-a(v) would be less than significant.

4.12.5.7 Mitigation Measures

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

4.12.5.8 Level of Significance After Mitigation

Not applicable.

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4.13 Transportation

This section evaluates the potential for impacts on transportation resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP; together referred to as the Proposed Project or Project). The analysis in this section is based in part on the following technical report:

- City of Brea Focused General Plan Update and Brea Core Specific Plan: Transportation Impact Analysis, Kittelson & Associates, January 2026 (Appendix H)

4.13.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to transportation.

4.13.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address transportation.

Federal

Federal Transportation Improvement Program

The Federal Transportation Improvement Program (FTIP) is a federally mandated four-year program of all surface transportation projects that will receive Federal funding or are subject to a federally required action. The FTIP is a comprehensive listing of such transportation projects proposed over a six-year period. As the metropolitan planning organization (MPO) for the region, the Southern California Association of Governments (SCAG) is responsible for developing the FTIP for submittal to the California Department of Transportation (Caltrans) and the Federal funding agencies.

The FTIP identifies specific funding sources and fund amounts for each project. It is prioritized to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while supporting efforts to attain Federal and State air quality standards for the region by reducing transportation related air pollution. Projects in the FTIP include highway improvements, transit, rail and bus facilities, high occupancy vehicle (HOV) lanes, high occupancy toll (HOT) lanes, signal synchronization, intersection improvements, freeway ramps, and non-motorized projects - bicycle and pedestrian.

The FTIP must include all federally funded transportation projects in the region, as well as all regionally significant transportation projects for which approval from Federal funding agencies is

required, regardless of funding source. Projects in the FTIP are consistent with SCAG's approved Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Code of Federal Regulations, Title 23, Section 450.220

Revised on April 1, 2005, Title 23, Section 450.220, of the Code of Federal Regulations requires each State to carry out a continual, comprehensive, and intermodal statewide transportation planning process. This planning process must include the development of a Statewide Transportation Plan and Transportation Improvement Program that facilitates the efficient economic movement of people and goods in all areas of the State.

Highway Capacity Manual

The Highway Capacity Manual, prepared by the Federal Transportation Research Board, is the result of a collaborative, multiagency effort between the Transportation Research Board, Federal Highway Administration, and American Association of State Highway and Transportation Officials. The Highway Capacity Manual contains concepts, guidelines, and computational procedures for the capacity and quality of service of various highway facilities, including freeways, signalized and unsignalized intersections, rural highways, and the effects of transit, pedestrians, and bicycles on the performance of these systems. The procedures from the Highway Capacity Manual 2016 methodology were used at intersections where the Highway Capacity Manual is limited in its analysis capabilities.

State

California Department of Transportation

Caltrans manages the operation of State highways and is the primary State agency responsible for transportation issues. One of its duties is the construction and maintenance of the State highway system. Caltrans approves the planning, design, and construction of improvements for all State-controlled facilities within the Project site. Freeway segments, freeway ramps and intersections associated with freeway on- and off-ramps fall under Caltrans jurisdiction.

State highways in the City include State Route (SR) 57, the City's main north/south limited access thruway, Imperial Highway (SR 90), which runs east/west across the southern section of the City, and Valencia Avenue/Carbon Canyon Road (SR 142), which runs northwest to San Bernardino County.

Caltrans has developed procedures to determine if State-controlled facilities require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and operational deficiencies at such facilities, Caltrans may recommend measures to address adverse effects from traffic caused by such projects. Caltrans also prepares comprehensive planning documents, including Corridor

System Management Plans and Transportation Concept Reports, which are long-range planning documents that establish a planning concept for State facilities.

Caltrans updated its guidance in 2020 to include metrics to evaluate transportation impacts based on vehicle miles traveled (VMT) and no longer sets a minimum acceptable level of service (LOS) for its facilities. Based on the Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide, Caltrans has transitioned from LOS performance standards to VMT to identify significant impacts.

> "For land use projects and plans, automobile delay is no longer considered a significant impact on the environment under CEQA (SB 743, 2013). Caltrans review of land use projects and plans is focused on a VMT metric, consistent with changes to the CEQA Guidelines (California Code of Regulations Section 15064.3(b)(1)). This VMT-focused TISG provides a foundation for review of how lead agencies apply the VMT metric to CEQA project analysis.
>
> Beyond or in addition to the use of the VMT metric, determining how the State Highway System may otherwise be affected by a land use project may still be necessary at times, particularly as it relates to the safety of the traveling public. Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and focuses on multi-modal conflict analysis as well as access management issues. With this guidance the Department will transition away from requesting LOS or other vehicle operations analyses of land use projects."

Note that LOS analyses may be required by Caltrans for local operational assessments (e.g., to support a queueing analysis at ramp terminus intersections).

Assembly Bill 32, Senate Bill 32, and Senate Bill 375

Assembly Bill (AB) 32, also known as the Global Warming Solutions Act of 2006, committed California to reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. In 2016, SB 32 added a new target: reducing statewide emissions to 40 percent below 1990 levels by 2030.

SB 375 provides guidance for curbing emissions from cars and light trucks to help California comply with AB 32. There are five major components to SB 375:

- Air Resources Board (ARB) will guide the adoption of GHG emission targets to be met by each Metropolitan Planning Organization (MPO) in the State.
- MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting these regional targets. The SCS must be consistent with the Regional Transportation Plan (RTP).

- Regional housing elements and transportation plans must be synchronized on eight-year schedules. Also, the SCS and Regional Housing Needs Assessment (RHNA) must be consistent with each other.
- CEQA is streamlined for preferred development types such as mixed-use projects and transit-oriented developments (TODs) if they meet specific requirements.
- MPOs must use transportation and air emission modeling methodologies consistent with California Transportation Commission (CTC) guidelines.

California Complete Streets Act of 2008 (AB 1358)

Originally passed in 2008, California's Complete Streets Act took effect in 2011 and requires local jurisdictions to plan for land use transportation policies that reflect a "complete streets" approach to mobility. "Complete streets" comprises a suite of policies and street design guidelines which provide for the needs of all road users, including pedestrians, bicyclists, transit operators and riders, children, the elderly, and the disabled. From 2011 onward, any local jurisdiction—county or city—that undertakes a substantive update of the circulation element of its general plan must consider "complete streets" and incorporate corresponding policies and programs. In 2010, OPR released guidelines for compliance with this legislation which provide direction on how circulation elements can best plan for a variety of travel modes such as transit, walking, bicycling, and freight.

On December 7, 2021, Caltrans announced a new policy for all new transportation projects it funds or oversees to include "complete street" features that provide safe and accessible options for people walking, biking, and taking transit. This policy will expand the availability of sustainable transportation options to help meet the State's climate, health, and equity goals.

Senate Bill 743

Senate Bill (SB) 743, which was signed into law on September 27, 2013 and became mandatory on July 2, 2020, fundamentally changed transportation impact analysis as part of California Environmental Quality Act (CEQA). In its Technical Advisory on Evaluating Transportation Impacts in CEQA, the California Governor's Office of Planning and Research (OPR) provided recommendations for jurisdictions to implement SB 743-compliant transportation analyses. OPR's recommendations are not binding and lead agencies ultimately have the discretion to set or apply their own significance thresholds, provided they are based on substantial evidence. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed under SB 743. It states that in general, transportation impacts are best measured by evaluating the project's vehicle miles traveled. For land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact.

In October 2020, Brea adopted a resolution that conforms with SB 743, transitioning to a VMT-based method of identifying transportation impacts for CEQA compliance and committing to meet

requirements of all future revisions to CEQA, consistent with the guidance provided by the State. The City of Brea Transportation Impact Assessment (TIA) Guidelines require a VMT analysis to be conducted for land use projects as deemed necessary by the City and applies to projects that have the potential to increase the baseline VMT for the City of Brea.

Senate Bill 99, Assembly Bill 101

The California Active Transportation Program (ATP), established by Senate Bill 99 and Assembly Bill 101 in 2013, aims to promote active modes of transportation like biking and walking. It combines various Federal and State transportation programs such as the Transportation Alternatives Program, Bicycle Transportation Account, and State Safe Routes to School into one cohesive initiative. The goal is to elevate California as a frontrunner in active transportation efforts.

Regional

Southern California Association of Governments (SCAG)

Founded in 1965, the Southern California Association of Governments (SCAG) is a Joint Powers Authority comprising local governments and agencies addressing regional issues. Designated both as a Metropolitan Planning Organization (MPO) under Federal law and as a Regional Transportation Planning Agency and a Council of Governments under State law, SCAG covers six counties and 191 cities over 38,000 square miles. SCAG develops long-range regional transportation plans, housing allocations, and contributes to air quality management plans.

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy) for Federal transportation conformity purposes only. Connect SoCal outlines more than $750 billion in transportation system investments through 2050.

SCAG created the SoCal Transportation Safety Resource Hub to assist local jurisdictions in advancing transportation safety and meeting annual safety targets. It serves as a centralized source for SCAG's safety programs, data, reports, and resources. The hub includes:

- Regional transportation safety goals and targets summary
- Overview of SCAG's existing transportation safety conditions
- Interactive map of SCAG's Regional High Injury Network (HIN) with downloadable data
- Resources for local jurisdictions to develop their own HIN
- Opportunities to engage in SCAG's ongoing safety efforts
- Access to data, tools, funding, and resources from SCAG and other organizations.

Orange County Transportation Authority

The Orange County Transportation Authority (OCTA) coordinates transportation planning efforts throughout Orange County and programs funding for project implementation. OCTA leads the following ongoing planning efforts:

- OCTA oversees Measure M2, the countywide sales tax measure to fund transportation improvements. Also known as OC GO, this program includes freeway, streets and roads, transit, and environmental projects to help relieve congestion, improve street conditions, expand transit services, synchronize traffic signals, reduce transportation costs for seniors and people with disabilities, and reduce transportation-related air and water pollution.
- OCTA prepares the Congestion Management Program (CMP), which identifies strategies to address congestion on the County's CMP network; which includes State highways and principal arterials. CMP Guidelines require analysis of the CMP network in order to measure congestion and to determine how local governments meet CMP standards and requirements. There are four CMP intersections in the City:
  - State Route (SR) 57 northbound ramps / Imperial Highway (SR 90)
  - SR 57 southbound ramps / Imperial Highway
  - State College Boulevard / Imperial Highway
  - Valencia Avenue / Imperial Highway
- OCTA administers the Master Plan of Arterial Highways (MPAH), which was established in 1956 to ensure that the County's regional arterial highway network would be planned, developed, and preserved in order to supplement the freeway system. The MPAH defines the intended functions and carrying capacities of regional roads in the County. In order to be eligible for Measure M2 (also known as OC Go) funding, a city's General Plan Circulation Element must be consistent with the MPAH; specifically, local Circulation Elements must maintain an equivalent number of minimum through lanes on each arterial highway that is included as part of the MPAH.
- OCTA's Long Range Transportation Plan (LRTP) is a long-range policy document that assesses the County's long-term transportation system and identifies regional projects in the County, which address future population, housing, and employment needs. The LRTP also serves as the County's local input to SCAG's broader RTP/SCS for Southern California. OCTA also plans, manages, and operates local transit service within Orange County.

Local

All roadways within the City are under the jurisdiction of the City, with the exception of Imperial Highway (SR 90), SR-57, and Carbon Canyon Road-Valencia Avenue (SR-142) which are under Caltrans' jurisdiction.

2003 Brea General Plan

The 2003 Brea General Plan articulates the collective vision of the community for its future and establishes a foundational framework for guiding decisions on development, resource management, public safety, public services, and community well-being. Crafted through collaboration among residents, businesses, educators, and officials, the plan reflects the values and aspirations of Brea. The General Plan Annual Progress Report offers a yearly update on the implementation of its elements, covering activities from January to December. It highlights ongoing projects and programs aimed at enhancing Brea's appeal as a desirable place to live, work, and enjoy leisure activities. The General Plan emphasizes preserving the City's unique natural and aesthetic attributes while adapting to regional growth and evolving community needs. It serves as a policy compass, aligning actions with Brea's overarching vision of making Brea a great place to live, work, learn, and play while respecting natural resources, fostering economic vitality, and enhancing quality of life.

The existing City of Brea General Plan identifies the following goals and visions related to mobility.

- To improve access to transportation, including accessible public transportation to Northwest neighborhoods;
- To Improve transportation, pedestrian, and visual connections between Downtown and the rest of the community;
- To provide for an extensive, integrated, and safe bicycle, hiking, and pedestrian network throughout the community, and to make Brea a pedestrian-friendly community;
- To ensure convenient alternative transportation modes allow for an integrated approach to addressing traffic problems;
- To maintain an effective regional transportation network;
- To provide a safe and efficient circulation system that meets the needs of the community; and
- To promote the use of alternative transportation modes such as transit, bicycling, and walking.

The 2003 Brea General Plan makes reference to a Growth Management Element, which requires traffic LOS standards. The general target standard is LOS D for intersections and recognizes that lower LOS standards for certain intersections in urbanized areas may be appropriate if such affected roadways carry a high proportion of regional traffic.

2020 Brea Connecting the Core Active Transportation Plan

The 2020 Brea Connecting the Core Active Transportation Plan (2020 Core ATP) was developed as phase one of the Specific Plan effort for the Brea's Core Area, to study cyclist and pedestrian safety along major corridors and to explore ways to improve the safety and experience for cyclists and pedestrians within Brea's Core Area. The 2020 Core ATP identified mobility challenges and proposed solutions to encourage walking and biking, emphasizing access for all, safety enhancements, and creative design solutions. The 2020 Core ATP was funded through a grant from Caltrans and was completed in 2020. The 2020 Core ATP allowed City staff to pursue grant funding for pedestrian and bicycle improvements in the Brea's Core Area.

The 2020 Core ATP will also serve as a component to help update the Focused GPU and the BCSP with respect to circulation, urban design, and bikeways. Major components of the 2020 Core ATP include:

- Three core elements with goals and policies for each:
  - Provide access for all users
  - Focus on safety enhancements
  - Institute creative design solutions
- A toolbox of improvements outlining facility types to improve multimodal transportation infrastructure.
- A detailed set of improvement options for ten corridors in the Brea Core Area included opportunities and recommendations for potential improvements.
- Steps to implement the 2020 Core ATP including pursuit of funding, regional coordination, environmental review, community outreach, and improvement designs.

The preparation of the new Specific Plan for the Brea Core Area will help to implement the City's long-term vision for this unique area by providing specific direction for development. The BCSP will incorporate recommendations from the 2020 Core ATP in order to improve the safety and experience of cyclist and pedestrians in the area, and will build upon findings in the 2020 Core ATP report to address improvements to streets, sidewalks, and public spaces. The 2020 Core ATP will evaluate and establish land use designation, zoning regulations, and design guidelines for future change to existing uses and new development. The 2020 Core ATP provides an opportunity to continue the 2017 Brea Envisions Community Strategic Plan conversation and dig deeper into the community's values and vision for the heart of the City.

Brea Capital Improvement Program (CIP)

The City's Public Works Department plans, designs, and implements capital projects to improve and preserve community assets. The goals of the Brea Capital Improvement Program (CIP) are to enhance the community's quality of life, ensure a safe environment, and improve transportation, utilities, and City facilities. The Brea CIP budget plan is both a planning and implementation

document. The current seven-year Brea CIP includes the appropriation of funds for Fiscal Year (FY) 2025-26 and FY 2026-27 with a planning horizon through 2032. The remaining five years of the Brea CIP are not a commitment of funds but used as a long-range planning tool for subsequent investments in the City's infrastructure. There are currently 72 projects in the current 7-year Brea CIP budget plan estimated at nearly $112 million. The Brea CIP categories include Street Improvements, Storm Drain Improvements, Traffic Safety Enhancements, Water Improvements, Sewer Improvements, Facility Improvements, and Golf Course Improvements. Programmed transportation-related improvements include items such as roadway rehabilitation, interchange, street and intersection improvements, traffic signal equipment upgrades, traffic calming improvements, traffic signal synchronization, and sidewalk replacement and installation.

Brea Transportation Impact Analysis Guidelines (2020)

State and Federal laws require the correlation between General Plan Land Use Element building intensities and the Circulation Element transportation network capacities. The City established TIA Guidelines to outline the specific steps for complying with the new CEQA expectations for VMT analysis and the applicable general plan consistency requirements. Brea TIA Guidelines are required by the City so that the impact of proposed land use modifications and development on the existing and future circulation system can be adequately assessed, and to ensure that the CEQA and relevant CMP laws and guidelines are met. The Brea TIA Guidelines require LOS analysis outside of CEQA to determine if a new development project would result in congestion and be inconsistent with the LOS goals in the General Plan.

As part of the North Orange County Collaborative, Brea released the North Orange County Collaborative (NOCC+) Traffic Study Screening Tool in 2020. The Tool assessed a project’s need for further VMT analysis based on three screenings: Transit Priority Areas (TPA), Low VMT Areas, and Project Types. The City has designated the Brea Mall Transit Center as a TPA. Low VMT Areas are defined as Traffic Analysis Zones [TAZs] lower than 15 percent of the citywide average. As of 2020, the 2003 Brea General Plan buildout VMT was calculated to be 29.9 VMT per service population.

4.13.1.2 Existing Conditions

Roadway Network

The roadway network in the City contains three State routes: State Route (SR) 57 (SR-57), Imperial Highway (SR-90), and Carbon Canyon Road-Valencia Avenue (SR-142). These routes, along with other significant roadways, as designated by OCTA’s Master Plan of Arterial Highways (MPAH) and the City’s current General Plan are described below.

State Route 57 Freeway

SR-57 is a facility under Caltrans' jurisdiction that serves as a significant north-west linkage between Los Angeles County and Orange County, connecting with Interstate (I) 5 (I-5) and SR-22 to the south and I-210, I-10 and SR-60 to the north. Within Brea, SR-57 is a 12-lane freeway with six lanes in each direction with a speed limit of 65 miles per hour. In Brea, SR-57 has interchanges at Lambert Road, Imperial Highway (SR-90), and Tonner Canyon Road.

Imperial Highway

Imperial Highway (SR-90) is classified as a major arterial within Brea, carrying significant vehicle volumes in an east-west direction. Imperial Highway (SR-90) primarily supports through-traffic with access to multiple residential and commercial destinations. With a speed limit of 40 miles per hour, it features two to three travel lanes on each side of the street, primarily divided by a center turn lane. All major intersections along Imperial Highway (SR-90) have pedestrian crosswalks and pedestrian signal heads; in addition, sidewalks are provided along the corridor. Additionally, Imperial Highway (SR-90) is designated as a Smart Street within the MPAH. A "Smart Street" includes various traffic-carrying capacity enhancements to facilitate traffic flow. In particular, modifications to Imperial Highway included restriping from four to six lanes, modification of medians at intersections, addition of bus pads and turnouts, and re-timed traffic signals to improve coordination. These modifications help to address traffic congestion and improve operations on the road.

Carbon Canyon Road

Carbon Canyon Road (SR-142) is under Caltrans' jurisdiction and is classified as a primary arterial from Valencia Avenue to Brea Hills Avenue, and as a collector from Brea Hills Avenue east to the city and county boundary. The roadway travels in the east-west direction and provides direct access to Olinda Village and cities to the east such as Chino Hills, Chino, and Eastvale. The roadway is rural in character, with one lane in each direction and no center divider. The roadway does not offer consistent pedestrian crosswalks as there is little pedestrian demand.

Valencia Avenue

Also classified as SR 142, Valencia Avenue is under Caltrans' jurisdiction between Lambert Road / Carbon Canyon Road and Imperial Highway (SR-90). This portion is classified as a primary arterial. The roadway travels in the north-south direction and provides a link between northeast and southeast Brea, as well as to the City of Placentia in the south. Valencia Avenue is a four-lane divided roadway for much of its length and features continuous sidewalks along the east side of the roadway, with sporadic sidewalks on its west side. The roadway includes pedestrian crosswalks at every signalized intersection.

Brea Boulevard

Brea Boulevard is classified as a primary arterial crossing the City in the north-south direction. This roadway accommodates a combination of uses, including commercial and mixed-use areas with a speed limit of 40 miles per hour. It features two travel lanes on each side of a median along with a left-turn lane at multiple locations. On-street parking spaces are available in most parts of this roadway. All major intersections along Brea Boulevard have pedestrian crosswalks and pedestrian signal heads; in addition, there are sidewalks along the corridor.

Lambert Road

Lambert Road is classified as a major arterial crossing the City in the east-west direction. This roadway primarily supports through-traffic with a speed limit of 40 miles per hour. It features two to three travel lanes on each side of the street alternating between a median and a center turn lane. Several intersections along Lambert Road have pedestrian crosswalks and pedestrian signal heads; in addition, there are sidewalks along the corridor.

Other Key Roadways

Other arterial roadways in Brea include State College Boulevard, Central Avenue, Puente Street, and Birch Street. Collector streets include Elm Street, Palm Street, Whittier Avenue, Santa Fe Road, and Placentia Avenue.

Transit Service

Public transit service in Brea is provided by fixed-route bus service operated by OCTA and Foothill Transit, plus local services provided by the City of Brea. All bus routes that operate within the City provide service to the Brea Mall Transit Center, located off State College Boulevard between Imperial Highway and Lambert Road.

OCTA is the major transit agency serving Orange County, with services including fixed-route buses and paratransit. It provides approximately 60 fixed bus routes, including local, community, express (Bravo!), and StationLink services on a countywide basis. OCTA bus network spans most of Orange County, connecting major cities, employment centers, transit hubs, and points of interest. OCTA provides connections to other municipalities and the rest of the region through transit nodes and other intermodal hubs. Systemwide, buses generally operate on 15 to 30-minute intervals during peak hours, with less frequent service during off-peak times and on weekends.

Currently, there are four OCTA bus routes that operate within the City[1]:

- Route 57 which operates between Brea and Newport Beach.
- Route 59 which operates between Anaheim and Irvine

[1] Orange County Transportation Authority, “Routes and Schedules”, last accessed December 2025. https://www.octa.net/getting-around/bus/oc-bus/routes-and-schedules/routes-and-schedules

- Route 129, a community route that operates between La Habra, Brea and Anaheim.
- Route 143, which operates from La Habra to Brea.

In addition, OCTA's ACCESS paratransit service serves those with disabilities.

Foothill Transit operates a fleet of over 300 buses throughout Southern California's San Gabriel Valley and Pomona Valley. Within Brea, Foothill Transit operates one route, typically on a one-hour schedule:

- Route 286 which runs between Pomona and Brea.[2]

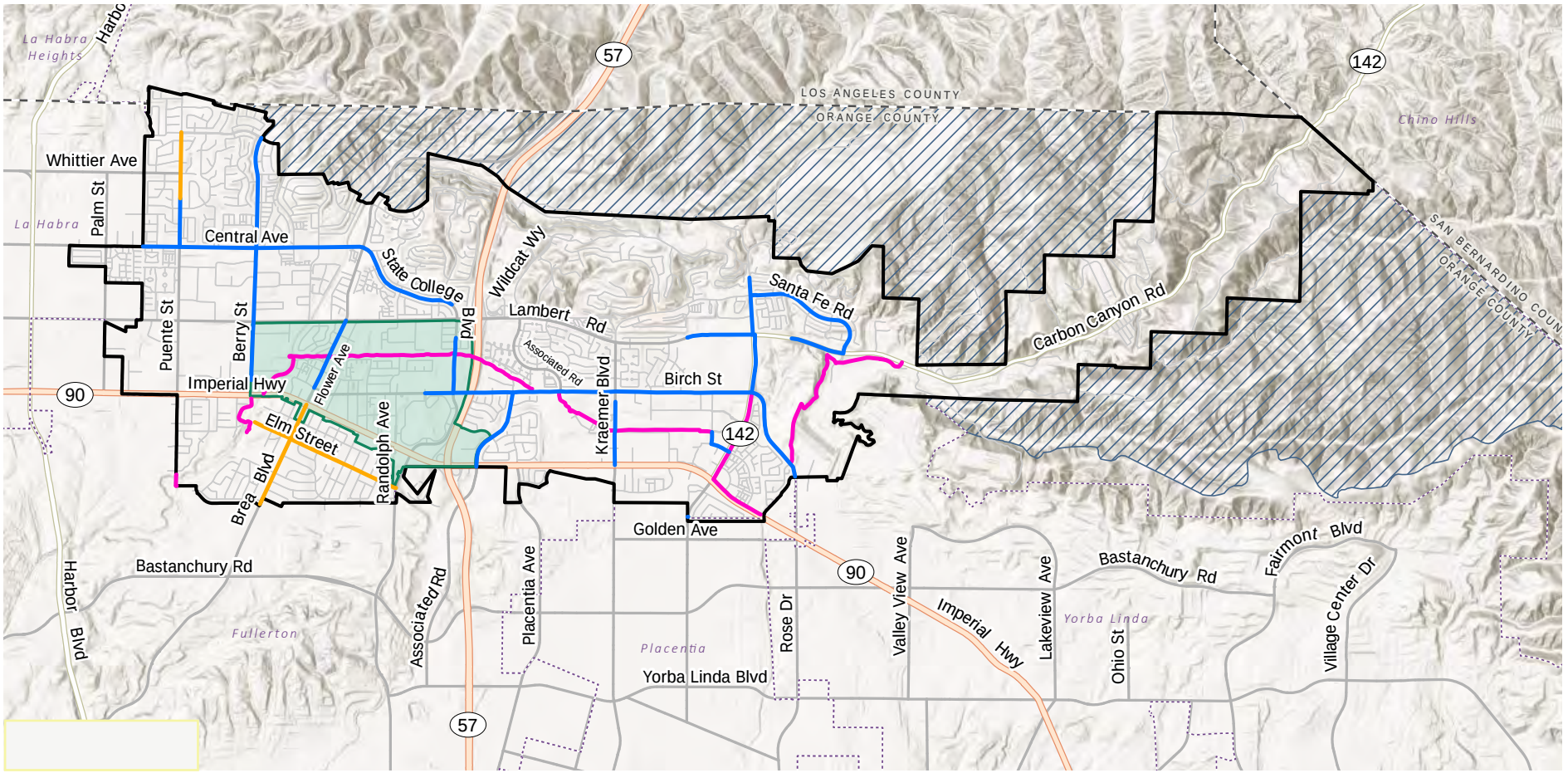
In addition to the routes provided by OCTA and Foothill Transit, the City provides local transportation services for seniors age 60 and older. The City offers free shuttle transportation for seniors, providing rides to the Senior Center and scheduled shopping trips. The shuttle operates Monday to Friday, requiring applicants to be 60+ years old and Brea residents. Rides are requested and scheduled one business day in advance. Additionally, a van service called "Seniors on the Go!" operates Tuesday to Friday offering rides for personal errands and community visits within Orange County for a small fee.[3]

Bicycle Facilities

Caltrans classifies and defines bicycle facilities. Caltrans designates four classes of bicycle facilities: Classes I, II, III, and IV. Existing bikeways in the City are shown in Figure 4.13-1, Existing Bikeway Network.

- **Class I Bikeway (Bike Path).** Also known as a shared path or multi-use path, a bike path is a paved right-of-way for bicycle travel that is separate from any street or highway (e.g., along a creek or channel).
- **Class II Bikeway (Bike Lane).** A striped and stenciled lane for one-way bicycle travel on a street or highway. This facility could include a buffered space between the bike lane and vehicle lane (referred to as a buffered bike lane) and the bike lane could be adjacent to on-street parking.

[2] Foothill Transit, "Schedules and Maps", last accessed May 2024. https://www.foothilltransit.org/buslines/timetables
[3] City of Brea, "Transportation", last accessed December 2025. https://www.cityofbrea.gov/1105/Transportation



LEGEND

- Brea City Boundary
- Brea Core Boundary
- Brea Sphere of Influence
- County Boundary

Existing Facilities

- Class I - Shared Use Path
- Class II - Bike Lane
- Class III - Shared Lane

Source: De Novo Planning Group, 2026.

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Miles

Figure 4.13-1

Existing Bikeway Network

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- **Class III Bikeway (Bike Route).** A signed route along a street where the bicyclist shares the right-of-way with motor vehicles. This facility can also be augmented using shared-lane markings (also known as sharrows). An enhanced bike route, known as a bicycle boulevard, can include traffic calming treatments to slow down vehicles.
- **Class IV Bikeway (Separated Bike Lane).** Also known as a cycle track or a protected bike lane, this is a bikeway for the exclusive use of bicycles including a separation between the bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking. A cycle track can be one-way or two-way.

The City does not have existing Class IV facilities.

Pedestrian Facilities

Throughout the City pedestrian facilities include crosswalks, pedestrian crossing signals, lighting, street trees, and curb ramps. The pedestrian network is comprised of sidewalks and multi-use paths, allowing residents to walk to their destination along dedicated paths and reducing conflicts with other travel modes. Routes to major destinations, such as schools and public facilities, attract youth and are important within the pedestrian network. Throughout the City, opportunities exist to improve sidewalk connectivity, installing pedestrian crossings, and maintaining consistency with pedestrian amenities.

Sidewalks are generally included on most roadways within the City; however, there are gaps in some of the residential and industrial areas of City. At locations where sidewalks are provided, Brea City Code requires sidewalks to be a minimum of 4 feet wide in residential areas, and a minimum of 5 feet wide in a commercial or industrial area, with additional ADA, curb-ramp and curb requirements.

Brea Core Specific Plan Area

The main arterials serving the BCSP area include Imperial Highway (SR-90), Birch Street, Lambert Road, Brea Boulevard and State College Boulevard, as described above. Transit service serving the BCSP is provided by OCTA by Routes 57, 59, 129 and 143 as well as Foothill Transit Route 286.

In the BCSP area, sidewalks exist along the majority of roadways. Few gaps in the sidewalks currently exist, such as portions of Lambert Road, Berry Road, and State College Boulevard. These gaps are small and typically occur in industrial areas that tend to have lower pedestrian demand, and some gaps occur only along one side of the street, with sidewalk connectivity available on the other side. In addition, several streets that encircle the Brea Mall are missing sidewalks. Similarly, there are gaps in lighting and crossing infrastructure in the BCSP area, as many sidewalks do not provide pedestrian buffers, such as street trees and landscaping, which improve perceived safety.

Within the BCSP, multiple intersections have high visibility crosswalks, including most intersections along Imperial Highway (SR-90), indicating a unique place and high pedestrian volumes.

Existing Vehicle Miles Traveled

This section summarizes the existing VMT levels in the City and its Sphere of Influence. The existing VMT was estimated based on outputs generated by OCTAM for current Brea conditions. Consistent with the City's TIA Guidelines, two types of VMT were determined[4]:

- **Total VMT:** This calculation represents the total daily VMT that starts and/or ends within a boundary (such as the City of Brea) but does not include VMT that travels through an area without starting or stopping there. VMT starting or ending within the City is not truncated at City boundaries.
- **VMT per Service Population:** This calculation represents the VMT for all trips that originate or end within an area, divided by that area's service population (residents + employees). VMT starting or ending within the City is not truncated at City boundaries.

At the City-level, existing total daily VMT is 1,168,996 and existing VMT per service population is 31.6.

4.13.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact on transportation if it would:

- **Threshold TRA-a:** Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- **Threshold TRA-b:** Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- **Threshold TRA-c:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- **Threshold TRA-d:** Result in inadequate emergency access.

4.13.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Proposed Project and help reduce or avoid potential impacts related to transportation:

[4] City of Brea, "Transportation Impact Analysis (TIA) Guidelines", 2020

PPP TRA-1 Each project applicant in the City of Brea is required to pay development impact fees to the City of Brea pursuant to the City's Assembly Bill 1600 Transportation Improvement Nexus Program (Ordinance 996). Based on a transportation improvement nexus program study conducted in 2011, the City Council adopted Resolution 2011-096, which updated the impact fees, effective February 4, 2012. Fair-share fees offset or mitigate the cumulative traffic impacts caused by new development. The program ensures all future development in the City of Brea contributes on a fair-share basis.

PPP TRA-2 **Traffic Control and Staging.** A site-specific construction worksite staging and traffic control plan within the public right-of-way will be prepared and submitted to the City of Brea for review and approval prior to the start of any construction work. This plan will include such elements as the location of any potential partial lane closures within the public right-of-way, hours during which lane closures (if any) would not be allowed, local traffic detours (if any) that may require rerouting of traffic through the public right-of-way, and protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs). The project applicant will be required to comply with the City-approved plan measures, including any specific regulations for construction activities and traffic control in the public right-of-way.

The new or updated General Plan goals and policies related to land use and planning are included as Appendix C, Brea General Plan Update Goals, Policies, and Actions, to this Program Environmental Impact Report (PEIR).

4.13.4 Environmental Impacts

The following sections address various potential impacts relating to transportation that could result from implementation of the Proposed Project.

4.13.4.1 Threshold TRA-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Impact Analysis

Focused General Plan Update and Brea Core Specific Plan

Roadways

As land use projects throughout the Proposed Project site are approved and developed, the City will continue to monitor conditions at vehicular facilities to determine the appropriate timing and/or level of improvement along those facilities. In addition, the City can request project-specific

circulation analyses once specific land use development projects are undergoing their review and approval processes.

The updated Mobility Element incorporates policies that guide roadway operations, safety, design, and goods movement. Key supporting policies include:

- **Policy M-1.2 Inter-Agency Coordination.** Engage with Federal Highway Administration (FHWA), the Southern California Association of Governments (SCAG), and Orange County Transportation Authority (OCTA) for balanced multi-modal planning.
- **Policy M-1.4 Emerging Technology.** Plan with regional partners for new transportation modes.
- **Policy M-2.1 Roadway Requirements.** Design roads for all modes/users and maintain according to best practices.
- **Policy M-2.2 Level of Service.** Strive to maintain acceptable level of service along City facilities per Transportation Impact Analysis (TIA) Guidelines.
- **Policy M-2.3 Non-Local Traffic.** Discourage regional traffic from passing through neighborhoods.
- **Policy M-2.4. Traffic Management.** Apply creative strategies to minimize congestion at schools and drive-throughs.
- **Policy M-2.8. Truck Route Network.** Maintain, and update local routes to reduce community impacts.
- **Policy M-3.1 Complete Streets Principles.** Implement best practices for all road users.
- **Policy M-3.5 New Mobility Technologies.** Monitor and implement tech that aids all transportation modes.
- **Policy M-3.7 Roadway Design Principles.** Support design that create safe, comfortable pedestrian experiences.

The Focused GPU would not be inconsistent with or in conflict with any adopted program, plan, ordinance, or policy addressing roadway operations, design, or performance. The Mobility Element establishes a policy framework that is consistent with applicable federal, state, and local roadway design and safety standards, including the City of Brea Transportation Impact Analysis (TIA) Guidelines, and provides direction to maintain acceptable roadway operations while accommodating multiple transportation modes. The Focused GPU outlines policies to guide future improvements and requires that roadway conditions be evaluated through project-specific circulation analyses at the time of development. Through continued monitoring of roadway conditions, inter-agency coordination, and implementation of traffic management strategies, the City would ensure that future development occurs in a manner consistent with adopted roadway plans and standards and would not result in conflicts with the circulation system.

Transit, Bicycle, and Pedestrian

In addition to proposed roadway classifications, the new Mobility Element references and incorporates the City's bicycle and pedestrian plans, which direct efforts to improve non-motorized accessibility and connectivity throughout the City.

The Proposed Project also proposes development within existing and future high-quality transit areas, which can encourage less driving and more transit, bike-to-transit, and walk-to-transit trips.

The Mobility Element developed as part of the Focused GPU contains policies that support access to and the performance of public transit, bicycle, and pedestrian facilities. These policies include:

- **Policy M-3.1 Complete Streets Principles.** Implement best practices for all road users.
- **Policy M-3.6 Curb Management.** Adjust curb zones to match land use needs and non-motorized choices.
- **Policy M-3.7 Roadway Design Principles.** Support designs that create safe, comfortable pedestrian experiences.
- **Policy M-3.8 Traffic Calming.** Use context-sensitive methods to balance auto, transit, and pedestrian needs.
- **Policy M-3.9 New Development – Multi-Modal Facilities.** Require land dedication for sidewalks and bike lanes.
- **Policy M-4.1 System of Bikeways.** Develop a comprehensive system for commuting and recreation.
- **Policy M-4.3 Pedestrian Connections.** Provide safe routes to Downtown and major activity centers.
- **Policy M-4.7 Bicycle, Pedestrian, and Connectivity Improvements.** Provide secure bike parking and lighting.
- **Policy M-4.10 Bicycle and Pedestrian Connectivity.** Plan neighborhood routes as a fully connected system.

The Focused GPU would not be inconsistent with or in conflict with any adopted program, plan, ordinance, or policy addressing the circulation system. The Mobility Element is an updated policy framework that incorporates and builds upon the City's existing transit, bicycle, and pedestrian goals and objectives. Policies in the Mobility Element promote multimodal access, connectivity, safety, and transit-supportive land use patterns, and do not propose actions that would degrade or preclude implementation of planned roadway, transit, bicycle, or pedestrian facilities. Development in high-quality transit areas and the requirement for multimodal accommodations in new development are consistent with State and local complete streets and sustainable transportation policies, and would not conflict with adopted circulation standards or performance objectives.

Therefore, the Focused GPU's impacts related to roadways, transit, bicycle, and pedestrian facilities would be considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.4.2 Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Impact Analysis

For the purposes of this VMT analysis, at least one of the following criteria must be met to determine that there is a significant VMT impact, per the City's TIA Guidelines:

- The baseline OR cumulative project-generated VMT per service population exceeds the City of Brea General Plan Buildout VMT per service population.
- The baseline OR cumulative link-level boundary Citywide VMT per service population increases under the plus project condition compared to the no project condition.

This impact analysis is based on citywide total VMT per service population (residents + employees).

Focused General Plan Update

For the purpose of this analysis, the horizon year is considered 2050, and the Proposed Project refers to the buildout of the Focused GPU, including the BCSP.

Citywide VMT per Service Population Analysis

VMT per service population (SP) represents all trips that originate or end within the area, divided by the city's service population (residents + employees). The technical data received from OCTA determining the VMT per SP is included in the Appendix.

The City of Brea General Plan Buildout VMT per service population (i.e., with the current General Plan) is 31.1. (Kittleson 2026) Table 4.13-1 shows the VMT per SP in the baseline project-generated and cumulative project-generated scenario and compares to the current Buildout amounts. As shown, the VMT per service populations in both the Baseline plus Project and Cumulative plus Project scenarios do not exceed the City of Brea General Plan Buildout VMT per service population. Therefore, there would not be a significant VMT impact for this threshold.

Table 4.13-1. Citywide VMT per Service Population Analysis

Scenario	VMT per Service Population	Exceeds Brea Buildout VMT per Service Population (31.1)?
Baseline Plus Project	29.8	No
Cumulative Plus Project	30.0	No

Note: VMT = vehicle miles traveled

Link-level Boundary Citywide VMT per Service Population Threshold

Link-level boundary citywide VMT per SP represents the total daily VMT that starts and/or ends within the City but does not include VMT that travels through the area without starting or stopping there, divided by the area's service population (residents + employees). The technical data determining the link-level boundary citywide VMT per SP is included in the Appendix.

Table 4.13-2 shows the link-level boundary citywide VMT per service population in the baseline plus project and cumulative plus project scenarios. As shown, the VMT per service populations in both scenarios do not exceed the link-level VMT per service population in the respective no-project scenarios. Therefore, there would not be significant VMT impact for this threshold.

Table 4.13-2. Link-Level Boundary Citywide VMT per Service Population Threshold

Scenario	No Project (VMT per SP)	With Project (VMT per SP)	With-Project VMT/SP Exceeds Respective No-Project VMT/SP?
Baseline	12.7	11.0	No
Cumulative	12.3	11.2	No

Note: SP = service population; VMT = vehicle miles traveled

The buildout of the Focused GPU would not result in a significant VMT impact under either VMT criterion in the City's TIA Guidelines. Therefore, overall, the Focused GPU's VMT impacts would be considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

As the Brea Core Specific Plan Area is a subset of the overall General Plan, a separate Core Area VMT analysis is not required. However, for informational purposes, the Core Area's VMT per SP, based on the overall citywide VMT, was determined.

To estimate Core Area's VMT, the proportion of the VMT that was attributable to the Core Area was identified. Using OCTAM data, the model Traffic Analysis Zones (TAZs) that were partially or completely within the Core Area, and the proportion of land uses within each TAZ, were identified. From this data, the percentage of the citywide ADT that would be generated by trips to,

from, and within in the Core Area for the Cumulative No Build (i.e., with the current General Plan) and Future 2050 Plus Project scenarios were estimated. For the VMT analysis, the total VMT for each TAZ was determined and the VMT per service population was calculated based on the net change in population and employment for the portion of the TAZ within the Core Area. This data was used to determine the total VMT and VMT per service population as shown in Table 4.13-3. The technical analysis is included in Appendix H. As shown in the table, the VMT per SP would decrease with the Project,

Table 4.13-3. VMT per Service Population Threshold for the Brea Core Specific Plan

Scenario	VMT	Service Population	VMT Per Service Population
Cumulative No Project	728,870	20,292	35.9
Cumulative Plus Project	900,121	28,654	31.4

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

Focused General Plan Update

The Focused GPU is a programmatic level document and increased hazards due to geometric design features are typically assessed at the project-level. As individual sites are developed and undergo City review and approval, the City can require site plan, access, and circulation analysis to ensure that neither on-site designs nor the interaction with City streets will result in hazardous geometric design features.

The types of uses included as part of the Focused GPU are generally similar to existing and surrounding uses and thereby are compatible with the existing uses and in the surrounding area.

In addition, the new Mobility Element developed as part of the Focused GPU contains policies in support of roadway network safety and reducing design hazards, including:

- **Policy M-1.4 Emerging Technology.** Plan with regional partners for new transportation modes.
- **Policy M-2.1 Roadway Requirements.** Design roads for all modes/users and maintain according to best practices.
- **Policy M-2.8 Truck Route Network.** Maintain, and update local routes to reduce community impacts.
- **Policy M-3.1 Complete Streets Principles.** Implement best practices for all road users.

- **Policy M-3.5 New Mobility Technologies.** Monitor and implement tech that aids all transportation modes.
- **Policy M-3.9 New Development – Multi-Modal Facilities.** Require land dedication for sidewalks and bike lanes.

Therefore, the Focused GPU's impacts related to geometric design and incompatible use hazards would be considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Increased hazards due to geometric design features are typically assessed at the project-level. The BCSP does not propose any site-specific projects within its boundaries. Individual projects within the BCSP would be reviewed by the City during the development review and permitting process for consistency with the BCSP's circulation system to ensure that they would not result in hazardous geometric design features. Any proposed lane reductions and intersection reconfigurations would need to be evaluated for emergency vehicle operations (including lane widths, turning movements, emergency signal priority/preemption needs, and queuing/blocked intersection risk) and refined as necessary to maintain emergency response functionality, consistent with Brea Fire Department access and operational requirements.

Modifications to the pedestrian network and to transit and bicycle facilities, including the addition of new crosswalks and off-street bicycle lanes, are anticipated within the BCSP area. These improvements are intended to enhance the multimodal transportation system and would be designed in accordance with applicable engineering and safety standards. Implementation of these improvements would not introduce sharp roadway curves, unsafe design features, or other hazardous conditions for vehicles, bicyclists, or pedestrians traveling within or adjacent to the BCSP area.

All roadway improvements within public rights-of-way would be required to comply with applicable construction control and traffic safety practices set forth in the California Department of Transportation Construction Manual and the California Manual on Uniform Traffic Control Devices. In addition, the BCSP would not introduce incompatible land uses, such as agricultural activities requiring slow-moving farm equipment on public roadways, that could adversely affect traffic safety.

Therefore, implementation of the BCSP would not substantially increase the potential for traffic hazards, and impacts related to design features or incompatible uses would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.4.4 Threshold TRA-d: Result in inadequate emergency access.

Impact Analysis

Focused General Plan Update

The Focused GPU is a programmatic level documents without any site-specific projects. Emergency accessibility is typically assessed at the project level. As individual sites are developed and undergo City review and approval, the City can require site plan, access, and circulation analysis to ensure that neither on-site designs nor the interaction with City streets will result in inadequate emergency access. Emergency access is evaluated at the project level and that circulation changes must maintain adequate emergency response functionality not to affect emergency response access and operational performance.

In Brea, emergency access and public safety issues are addressed through the General Plan, including within the new Mobility Element. The new Mobility Element as part of the Focused GPU would provide a framework to ensure that development and transportation planning support adequate emergency response capabilities within Brea.

The new Mobility Element would support emergency access through roadway design, traffic management, and multimodal system planning that ensures access for emergency vehicles and clear evacuation paths. The new Mobility Element emphasizes maintaining a connected and resilient street network that accommodates all users, including emergency responders, even in high-density or transit-oriented areas.

Relevant supporting policies from the new Mobility Element include:

- **Policy M-1.2 Inter-Agency Coordination.** Engage with Federal Highway Administration (FHWA), the Southern California Association of Governments (SCAG), and Orange County Transportation Authority (OCTA) for balanced multi-modal planning.
- **Policy M-2.7 Evacuation Routes.** Maintain and improve routes consistent with Public Safety planning.
- **Policy M-3.9 New Development – Multi-Modal Facilities.** Require land dedication for sidewalks and bike lanes.

In addition, the new Mobility Element is supported by the updated Public Safety Element, which outlines strategies to mitigate risks associated with natural hazards, including wildfires, floods, and earthquakes, working in conjunction with the Brea Local Hazard Mitigation Plan (LHMP) and Emergency Operations Plan (EOP).

Focused GPU's key Public Safety Element policies and programs include:

- **Policy PS-1.3 City Standards.** Require development in FHSZs to meet designated standards.
- **Policy PS-1.5 Development in VHFHSZs.** Minimize new residential development in VHFHSZs.
- **Policy PS-1.6 Fire Protection Plans.** Require adequate plans and emergency access for VHFHSZ projects.
- **Policy PS-1.9 Fire Hazard Reduction Projects.** Maintain community fire breaks and road clearance.
- **Policy PS-1.10 Standards for New Development.** Require brush management and visible signage/addressing.
- **Policy PS-1.14 Access.** Require sufficient ingress/egress for firefighting activities.
- **Policy PS-1.15 Education.** Educate community on fire safety, focusing on at-risk populations.
- **Policy PS-1.17 Fire and Building Codes.** Require compliance with current California Codes.
- **Policy PS-1.18 Critical Facilities.** Locate new essential facilities outside of VHFHSZs when feasible.
- **Policy PS-1.19 Mutual Aid.** Maintain disaster response agreements with state and county partners.
- **Policy PS-6.5 Automatic and Mutual Aid.** Participate in aid agreements with adjacent providers.
- **Policy PS-6.6 Evacuation Routes.** Work with Fire/Police to define standards and assessment ranges.
- **Policy PS-6.8 Collaboration.** Link emergency services with mitigation programs.
- **Policy PS-6.10 Volunteer Service.** Support programs like CERT training.
- **Policy PS-6.11 Warning Systems.** Maintain and upgrade mass communications systems.

The Focused GPU would not be inconsistent with or in conflict with any adopted program, plan, ordinance, or policy addressing emergency access and response. The Mobility Element and Public Safety Element collectively establish policies that ensure roadway design, circulation planning, and development review processes maintain adequate access for emergency vehicles and evacuation needs. These policies are consistent with applicable local and regional requirements, including roadway standards, evacuation route planning, and fire safety regulations codified in the Brea City Code. The Focused GPU does not propose physical changes that would obstruct emergency access, and emergency access adequacy is evaluated and enforced through subsequent project-level review. Implementation of the Focused GPU would not result in inadequate emergency access or conflict with adopted emergency response and circulation policies.

Therefore, the Focused GPU's impacts related to emergency access would be considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Emergency accessibility is typically assessed at the project level. The BCSP does not propose any site-specific development projects. As individual sites are developed and undergo City development review and permitting process, internal circulation system within the site and connection with the City's street system would be reviewed to ensure that neither on-site designs nor the interaction with City streets would result in inadequate emergency access. The Brea Fire Department would also review individual projects for adequate provision of emergency access, water, and accessibility. Individual projects within the BCSP would also be subject to building plan check for site plan and emergency access to ensure that appropriate fire safety features have been incorporated to reduce project impacts. Therefore, impacts would be less than significant, and the BCSP is not anticipated to result in inadequate emergency access.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to transportation that could result from implementation of the project.

4.13.5.1 Cumulative Threshold TRA-a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Focused General Plan Update and Brea Core Specific Plan

Future development facilitated by the Focused GPU would connect to the existing and proposed circulation system under the new Mobility Element and implement the City's design standards. In addition, future development facilitated by the Proposed Project would provide new facilities, such as sidewalks, to improve pedestrian mobility; and would not conflict with a plan, ordinance, or policy addressing circulation. In addition, cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews that would not allow potential cumulatively considerable impacts related to inconsistencies with plans, programs, policies, and ordinances addressing circulation. Therefore, implementation of the Proposed Project would not combine with other cumulative projects to result in significant cumulative impact.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.5.2 Cumulative Threshold TRA-b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Focused General Plan Update and Brea Core Specific Plan

For cumulative conditions, a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact if it were aligned with long-term State environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS. The geographic context for the analysis of cumulative traffic impacts includes traffic volumes resulting from buildout under the Proposed Project. As identified above under Section 4.13.4.2 Threshold TRA-b, buildout under the Proposed Project would result in a decrease in citywide VMT per service population in 2050 compared to the existing baseline and therefore would result in a less than significant impact. Therefore, buildout under the Proposed Project would not result in a cumulatively considerable impact regarding VMT.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.5.3 Cumulative Threshold TRA-c: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Focused General Plan Update and Brea Core Specific Plan

As evaluated in Section 4.13.4.3 Threshold TRA-c, implementation of the Proposed Project would not result in impacts related to incompatible uses or hazards due to roadway design. Proposed improvements to the circulation network facilitated by the Focused GPU would be required to be installed in conformance with City design standards that would be ensured through the City's development permitting process to ensure that no potentially hazardous design features would be introduced that could combine with potential hazards from other nearby projects. Any proposed lane reductions and intersection reconfigurations would need to be evaluated for emergency vehicle operations (including lane widths, turning movements, emergency signal priority/preemption needs, and queuing/blocked intersection risk) and refined as necessary to maintain emergency response functionality, consistent with Brea Fire Department access and operational requirements. In addition, cumulative development in the city and surrounding jurisdictions would be subject to site-specific reviews, including reviews by building and fire authorities that would require compliance with existing building and fire code standards that limit the potential of other projects to create design hazards. Therefore, the Proposed Project's impacts concerning design features (e.g., sharp curves or dangerous intersections) or incompatible uses would not be cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.5.4 Cumulative Threshold TRA-d: Result in inadequate emergency access.

Focused General Plan Update and Brea Core Specific Plan

As evaluated in Section 4.13.4.4 Threshold TRA-d, implementation of the Proposed Project would not result in impacts related to inadequate emergency access. Proposed improvements to the circulation network facilitated by the Focused GPU would be required to be installed in conformance with City design standards that would be ensured through the City's development permitting process to ensure that inadequate emergency access would result. In addition, cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews, including reviews by building and fire authorities that would require compliance with existing building and fire code standards that limit the potential of other projects to create interference with emergency access. Therefore, the Proposed Project's impacts related to emergency access would not be cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.13.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds TRA-a through TRA-d would be less than significant with compliance with all applicable regulatory requirements, payment of impact fees as outlined in PPP TRA-1, implementation of traffic control and staging measures on public rights-of-way during construction as outlined in PPP TRA-2, and implementation of new Mobility Element policies.

4.13.7 Mitigation Measures

No significant impacts were identified, and no mitigation measures are necessary.

4.13.8 Level of Significance After Mitigation

Less than significant impact.

4.14 Tribal Cultural Resources

This section evaluates the potential for impacts on Tribal Cultural Resources (TCRs) resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP; together referred to as the Proposed Project or Project).

4.14.1 Environmental Setting

The following sections describe the history of the Proposed Project area and discuss known TCRs in or around the Proposed Project area.

4.14.1.1 Regulatory Setting

The treatment of cultural resources is governed by Federal and State laws and guidelines. There are specific criteria for determining if prehistoric and historic sites or objects are significant or protected by law. Federal and State significance criteria generally focus on the resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State criteria. The laws and regulations seek to mitigate impacts to significant prehistoric or historic resources. The Federal and State laws and guidelines for protecting historical resources are summarized below.

Federal

National Historic Preservation Act (U.S. Code, Title 54, Section 300101 et seq.)

The Archaeological Resources Protection Act (U.S. Code, Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on Federal and Indian lands.

National Historic Preservation Act (U.S. Code, Title 54, Section 300101 et seq.)

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for their historical significance at the local, State, or national level. Listing in the NRHP provides recognition that a property is significant to the nation, the State, or the community and assumes that Federal agencies consider historical value in the planning for Federal and Federally assisted projects. Properties listed in the NRHP or determined eligible for listing must meet certain criteria for historical significance and possess integrity of form, location, and setting. Structures and features must usually be at least 50 years old to be considered for listing in the NRHP, barring exceptional circumstances. Criteria for listing in the NRHP, which are set forth in Code of Federal Regulations, Title 36, Part 60.4, are the quality of significance in American history, architecture, archaeology,

engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that:

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

Eligible properties must meet at least one of the criteria and exhibit integrity, which is measured by the degree to which the resource retains its historic properties and conveys its historic character, the degree to which the original fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the California Environmental Quality Act (CEQA) Guidelines.

Native American Graves Protection and Repatriation Act (U.S. Code, Title 25, Section 3001 et seq.)

The Native American Graves Protection and Repatriation Act (NAGPRA) is a Federal law passed in 1990. NAGPRA provides a process for museums and Federal agencies to return certain Native American cultural items—human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants and culturally affiliated Native American Tribes and Native Hawaiian organizations. NAGPRA includes provisions for unclaimed and culturally unidentifiable Native American cultural items, intentional and inadvertent discovery of Native American cultural items on Federal and Tribal lands, and penalties for noncompliance and illegal trafficking. Implementation of the Proposed Project would be conducted in compliance with NAGPRA.

Federal curation regulations are also provided in Title 36, Part 79, of the Code of Federal Regulations and apply to collections that are excavated or removed under the authority of the Antiquities Act (16 USC 431–433), the Reservoir Salvage Act (16 USC 469–469c), Section 110 of the National Historic Preservation Act (16 USC 470h-2), or the Archaeological Resources Protection Act (16 USC 470aa–mm). Such collections generally include those that are the result of a prehistoric or historical resources survey, excavation, or other study conducted in connection with a Federal action, assistance, license, or permit.

State

Assembly Bill 52: Native Americans: California Environmental Quality Act

Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American Tribes as part of CEQA and equates significant impacts on TCRs with significant environmental impacts (California Public Resources Code, Section 21084.2). California Public Resources Code, Section 21074, defines TCRs as follows:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

Sacred places can include Native American sanctified cemeteries, places of worship, religious or ceremonial sites, and sacred shrines. In addition, both unique and non-unique archaeological resources, as defined in California Public Resources Code, Section 21083.2, can be TCRs if they meet the criteria detailed above. The lead agency relies on substantial evidence to make the determination that a resource qualifies as a TCR when it is not already listed in the California Register of Historical Resources (CRHR) or a local register.

AB 52 defines a "California Native American Tribe" as a Native American Tribe in California that is on the contact list maintained by the Native American Heritage Commission (NAHC) (California Public Resources Code, Section 21073). Under AB 52, formal consultation with Tribes is required before determining the level of environmental document if a Tribe has requested to be informed by the lead agency of proposed projects and if the Tribe, upon receiving notice of the project, accepts the opportunity to consult within 30 days of receipt of the notice. AB 52 also requires that consultation, if initiated, address project alternatives and mitigation measures for significant effects if specifically requested by the Tribe. AB 52 states that consultation is considered concluded when the parties agree to measures to mitigate or avoid a significant effect on TCRs or when either the Tribe or the lead agency concludes that mutual agreement cannot be reached after making a reasonable, good-faith effort. Under AB 52, any mitigation measures recommended by the lead agency or agreed on with the Tribe may be included in the final environmental document and in the adopted Mitigation Monitoring and Reporting Program if the mitigation measures were determined to avoid or lessen a significant impact on a TCR.

If the recommended measures are not included in the final environmental document, then the lead agency must consider the four mitigation methods described in California Public Resources Code, Section 21084.3(e). Any information submitted by a Tribe during the consultation process is considered confidential and is not subject to public review or disclosure.

Assembly Bill 978: California Native American Graves Protection and Repatriation Act

The California NAGPRA, enacted in 2001, required the State agencies and museums that receive State funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. California NAGPRA also provides a process for the identification and repatriation of these items to the appropriate Tribes.

California Government Code, Sections 6254(r) and 6254.10

Sections 6254(r) and 6254.10 of the California Government Code were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the NAHC, another State agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a State or local agency."

California Health and Safety Code, Section 7050.5, and California Public Resources Code, Section 5097.9

California Health and Safety Code, Section 7050.5, addresses the protection of human remains discovered in any location other than a dedicated cemetery and makes it a misdemeanor for any person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law, except as provided in California Public Resources Code, Section 5097.99. It further states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains will occur until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions concerning investigation of the circumstances, manner, and cause of any death and that the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to their authorized representative, in the manner provided in California Public Resources Code, Section 5097.98. If the county coroner determines that the remains are not subject to their authority and if the county coroner recognizes the human remains

to be those of a Native American or has reason to believe that they are those of a Native American, they shall contact, by telephone and within 24 hours, the NAHC. Whenever the NAHC receives notification of a discovery of Native American human remains from the county coroner, the agency shall immediately notify the most likely decadents if it believes them to be the most likely descendants of the deceased Native American. The most likely descendants may inspect the site of the discovery and make recommendations on the removal or reburial of the remains.

California Register of Historical Resources

The CRHR is a State government program for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHR is the authoritative guide to the State's significant historical and archaeological resources and encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protections under CEQA.

The term "historical resource" includes but is not limited to any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (California Public Resources Code, Section 5020.1[j]). Historical resources may be designated as such through three different processes:

- Official designation or recognition by a local government pursuant to local ordinance or resolution (California Public Resources Code, Section 5020.1[k])
- A local survey conducted pursuant to California Public Resources Code, Section 5024.1(g)
- Listing in or eligibility for listing in the NRHP (California Public Resources Code, Section 5024.1[d][1])

To be eligible for listing in the CRHR, a building must satisfy at least one of the following four criteria:

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

Native American Historic Cultural Sites (California Public Resources Code, Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to one year in jail to deface or destroy a Native American historical or cultural site that is listed or may be eligible for listing in the CRHR.

Senate Bill 18: Traditional Tribal Cultural Places

As of March 1, 2005, Senate Bill 18 (California Government Code, Sections 65352.3 and 65352.4) requires that, before the adoption or amendment of a General Plan proposed on or after March 1, 2005, a city or county must consult with Native American Tribes with respect to the possible preservation of, or the mitigation of impacts to, specified Native American places, features, and objects within that jurisdiction. The consultation intends to establish a meaningful dialogue regarding potential means to preserve Native American places of importance. It allows for Tribes to hold conservation easements and for Tribal Cultural Places to be included in open space planning.

Local

There are no existing local regulations pertaining to TCR.

4.14.1.2 Existing Conditions

The City of Brea (City) is located in northern Orange County, near the foothills of the Puente and Chino Hills. This area contains a long record of human occupation, represented through prehistoric archaeological sites, ethnographic Tribal territories, early Spanish and American settlement, and ongoing Tribal cultural values connected to the landscape. These resources may occur on the surface or subsurface, within open space areas, drainage corridors, and ridgelines.

The City sits within the northern portion of Orange County, along the foothills of the Puente and Chino Hills. This area contains evidence of long-term Indigenous occupation, ethnographically documented Tongva (Gabrielino) and the Juaneño territories, historical ranching landscapes, and contemporary Tribal cultural values that remain strongly tied to the local environment. The Tongva (Gabrielino) people are recognized as the Indigenous inhabitants of the Los Angeles Basin and parts of northern Orange County, and the Juaneño people ethnographically occupied Orange County and parts of San Diego, Los Angeles, and Riverside Counties, including the area encompassing the present-day City of Brea. These Indigenous communities engaged in hunting, gathering, fishing, trade, and social networks that were deeply connected to natural features such as rivers, canyons, and watersheds that also occur in and around the City (NAHC 2026).

Indigenous Presence and Early Use of the Area

The Tongva (Gabrielino)

As previously stated, the City is located within an area historically occupied and used by the Tongva (Gabrielino) people, who are recognized as having inhabited much of what is now northern Orange County and the greater Los Angeles region for approximately 3,500 years prior to European contact. Early accounts describe the Brea area as an undisturbed natural landscape used by Tongva communities, likely for seasonal habitation, travel, and access to natural resources.

The earliest written documentation of Indigenous presence in the Brea area dates to July 1769, when members of the Portolá expedition, including Father Juan Crespi, recorded camping near a small Tongva settlement in the vicinity of what is now Brea Canyon. This record confirms the presence of Native communities in the immediate area at the time of first European exploration.

The Juaneño (Acjachemen)

The Juaneño people are the original inhabitants of the lands that ultimately became the County of Orange, as well as parts of San Diego, Los Angeles, and Riverside Counties, before the Spanish arrived to build Mission San Juan Capistrano. The Juaneño people indicate that archaeological evidence shows the Tribe's presence in the region for over 10,000 years. The Acjachemen resided in permanent, well-defined villages and seasonal camps. Village populations ranged from 35 to 300 inhabitants, consisting of a single lineage in the smaller villages, and of a dominant clan joined with other families in the larger settlements. Each clan had its own resource territory and was "politically" independent; ties to other villages were maintained through economic, religious, and social networks in the immediate region (Juaneño Band of Mission Indians Acjachemen Nation 2026).

Post-Contact Land Use and Transformation of the Landscape

Following Spanish contact and subsequent mission expansion, Indigenous use of the land declined as the area was incorporated into the Mexican land grant system by the early 19th century. Large portions of land that would later become the City of Brea were used primarily for cattle ranching and sheep grazing, activities that substantially altered the landscape but did not involve extensive urban development during this period.

By the late 19th century, continued grazing and early agricultural uses persisted, while natural features such as tar seeps ("brea") remained a notable characteristic of the landscape. These features were later exploited as a fuel source but may also have held cultural significance to Indigenous peoples prior to industrial use.

Industrial Development and Potential Effects on Tribal Cultural Resources

Beginning in the late 1890s, extensive oil exploration and drilling occurred in Brea Canyon and Carbon Canyon, marking a major shift from a largely undeveloped landscape to one characterized

by industrial activity. Oil development introduced ground disturbance through drilling, infrastructure installation, and settlement growth, which likely affected surface and subsurface archaeological resources.

Although these activities substantially altered the landscape, they do not preclude the possibility that previously unidentified TCRs, including buried archaeological deposits or culturally significant landscape elements, may remain intact in less-disturbed areas, particularly in canyon environments and undeveloped lands (City of Brea 2017).

4.14.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact on TCRs if it would:

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

4.14.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Focused GPU and help reduce or avoid potential impacts related to TCRs:

PPP CUL-3 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent

remains until the county coroner has been contacted. If applicable, the Native American Heritage Commission will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code Section 5097.98.

The new or updated General Plan goals and policies related to TCRs are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to this Program Environmental Impact Report (PEIR).

4.14.4 Environmental Impacts

The following sections address various potential impacts relating to TCRs that could result from implementation of the Proposed Project.

4.14.4.1 Threshold TCR-a: Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code, Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code, Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code, Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code, Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Impact Analysis

Focused General Plan Update

The Focused GPU is a policy-level planning document and does not propose, approve, or authorize any specific physical development or ground-disturbing activities. Therefore, adoption of the Focused GPU would not directly result in a substantial adverse change to TCRs. However, implementation of the Focused GPU would facilitate future discretionary development projects on the Project area. Such projects could involve grading, excavation, and other ground-disturbing activities that have the potential to result in substantial adverse change to TCRs. TCRs may occur both at the surface and belowground, and construction activities associated with future development—particularly in areas that are undeveloped, have not been previously subject to TCR investigations, or where excavation would extend beyond the depth of prior disturbance—could result in impacts to these resources. Furthermore, some existing improvements within the

City (e.g., roads, buildings, structures, etc.) were likely constructed prior to the existence of cultural resources protection laws and may have been built on TCRs; therefore, the current or prior existence of development throughout the City does not preclude the presence of TCRs located under this Proposed Project area.

In considering the significance of the resource to a California Native American Tribe, the City contacted the NAHC for the listing of Tribes with traditional lands or cultural places located within the boundaries of the Project area and to search the Sacred Lands File (SLF). The SLF search result was negative. The negative finding letter from the NAHC is included in Appendix F1, Cultural Resources Data, to this PEIR.

SB 18 and AB 52 require meaningful consultation between lead agencies and California Native American Tribes on potential impacts to TCRs, as defined in Public Resources Code, Section 21074. A TCR is a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is either on or eligible for inclusion in the California Historic Register or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (Public Resources Code, Section 21074[a][1–2]). TCRs may be found throughout Orange County, but information about them is much more difficult to obtain than for most archaeological resources. Currently, there is no database of such resources, and most cannot be identified by surveying the land. Identification of TCRs requires coordination with Native American Tribes, and their precise location is often difficult to determine because they are often only documented through the oral history of the Tribe.

The City submitted notification letters pursuant to AB 52 and SB 18 to Native American individuals and organizations on August 22, 2025. They included contact people from the following Tribes listed on the contract list provided by the NAHC:

- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation – Belardes
- Juaneño Band of Mission Indians Acjachemen Nation 84A
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians

On September 2, 2025, Gabrielino Band of Mission Indians – Kizh Nation (Kizh Nation) declined consultation. Juaneño Band of Mission Indians requested consultation on August 27, 2025, and the consultation meeting was held on September 15, 2025. It was agreed that because the Proposed Project is a policy-level planning document that there would not be direct impacts to TCRs.

Consultation with the Juaneño Band of Mission Indians concluded on September 16, 2025. No other Tribes contacted the City for consultation.

The Proposed Project does not propose any site-specific development projects. However, there are potential for unevaluated TCRs on the Project area given the prehistoric occupation of the Project area by the Juaneño (Acjachemen) and the Tongva (Gabrielino) people. Therefore, it is possible that future development on the Project area may result in the identification of unrecorded TCRs, and impacts would be considered potentially significant.

Potential impacts to TCRs are inherently site-specific and cannot be fully evaluated at the program level because they depend on the location, depth, and extent of future ground-disturbing activities, as well as the presence, integrity, and significance of TCRs at individual sites. Accordingly, site-specific evaluation based on individual development proposal would be necessary to fully evaluate impacts to TCRs. Future discretionary projects implemented under the Focused GPU would be required to comply with applicable CEQA requirements, including compliance with SB 18 and AB 52 consultation, and provide appropriate mitigation, as applicable. Site-specific development projects under the Focused GPU that are not subject to AB 52 would also require measures to reduce potential TCRs impacts to a less than significant level.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM TCR-1 is required.

Level of Significance After Mitigation: Less than significant.

Brea Core Specific Plan

The analysis above for the Focused GPU also applies to the BCSP. Although the BCSP itself does not propose any specific development projects, the area has prehistoric ties to the Juaneño (Acjachemen) and Tongva (Gabrielino) peoples, meaning unrecorded TCRs could be present. As a result, future development could potentially cause significant impacts if such resources are discovered. Site-specific development projects under the BCSP could result in potentially significant TCR impacts without mitigation.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM TCR-1 is required.

Level of Significance After Mitigation: Less than significant.

4.14.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to TCRs that could result from implementation of the Proposed Project. The cumulative setting considered for the

Proposed Project is northern Orange County that occur in the same tribal influence areas as the Project area. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.14.5.1 Cumulative Threshold TCR-a: Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Focused General Plan Update and Brea Core Specific Plan

The geographic context for the analysis of impacts related to TCRs is generally site-specific, rather than cumulative in nature, because each development site has unique Tribal cultural considerations. In this way, potential cumulative impacts relating to TCRs would be minimized on a site-by-site basis to the extent that appropriate consultation is conducted. Future development on the Proposed Project area and the larger Orange County region, including growth anticipated through implementation of the Proposed Project, could result in a substantial adverse change in the significance of TCRs, thus resulting in a potentially significant cumulative impact. However, the required compliance with AB 52 consultation and the provision of a Tribal monitor and establishing appropriate discovery and treatment measures for TCRs as required in Mitigation Measure MM TCR-1 would ensure that TCRs are properly identified and treated to reduce impacts on these resources. Additionally, Mitigation Measure MM TCR-2 would require that a qualified archaeologist evaluate the significance of any non-native cultural resources discovered during ground disturbance. For these reasons, the Proposed Project's contribution to this potentially significant cumulative impact would not be cumulatively considerable.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Implementation of Mitigation Measure MM TCR-1 is required.

Level of Significance After Mitigation: Less than significant.

4.14.6 Level of Significance Before Mitigation

Environmental impacts related to Threshold TCR-a are potentially significant without mitigation.

4.14.7 Mitigation Measures

MM TCR-1 **Provision of Tribal Monitor.** Prior to commencement of any ground-disturbing activities for qualifying development projects in which the potential exists for Tribal Cultural Resources to be present based on record searches or tribal knowledge, the project applicant shall coordinate with all interested State-recognized Tribes in concurrence with the City of Brea as the California Environmental Quality Act (CEQA) lead agency. A copy of the executed contract shall be submitted to the City of Brea Community Development Department prior to the issuance of any permit necessary to commence a ground-disturbing activity.

- The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined by the Consulting Tribe as activities that may include, but are not limited to, pavement removal, potholing or augering, grubbing, tree removals, boring, grading, excavation, drilling, and trenching. The Tribal monitor shall complete daily monitoring logs describing construction activities, locations, soil conditions, and any cultural materials identified. The monitoring shall end when all ground-disturbing activities are completed, or when the qualified archaeologist and/or Tribal monitor determines that all remaining ground-disturbing activities have little to no potential for impacting Tribal Cultural Resources.
- Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor. If the resources are Native American in origin, the Consulting Tribe will retain Tribal Cultural Resources in the form and/or manner the Consulting Tribe deems appropriate, for educational, cultural and/or historic purposes.
- If human remains and/or grave goods are discovered or recognized at the projects site, all ground disturbance shall immediately cease within 100 feet of discovery, and the county coroner shall be notified per Public Resources Code (PRC), Section 5097.98, and Health and Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per PRC Section 5097.98(d)(1) and (2).

- Work may continue on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines, Section 15064.5(f)).
- If a non-Native American resource is determined by the qualified archaeologist to constitute as a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines, Section 15064.5(f) for historical resources and PRC Section 21074(b) for unique archaeological resources.

MM TCR-2 **Discovery of Cultural Resources (Not Native American in Origin):** Prior to commencement of any ground-disturbing activity at the project site, the project applicant shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (National Park Service [NPS] 1983). If cultural resources that are not Native American in origin are encountered during ground-disturbing activities, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. If the discovery proves to be significant as determined by the site archaeologist, additional work such as data recovery excavation may be warranted and shall be reported to the City of Brea Community Development Department.

4.14.8 Level of Significance After Mitigation

Threshold TCR-a: Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code, Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code, Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code, Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code, Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Implementation of Mitigation Measures MM TCR-1, MM TCR-2, and PPP CUL-3 would reduce potential adverse impacts to TCRs to a less than significant level by requiring monitoring by a qualified Tribal monitor during applicable ground-disturbing activities and establishing minimum measures to follow in the event of discovery of TCRs, including treatment measures. Therefore, impacts would be reduced to less than significant, and no significant and unavoidable impacts would remain.

4.15 Utilities and Service Systems

This section evaluates the potential for impacts on utilities and service systems resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project). Impacts from the Focused GPU are addressed at a programmatic level based on the City's Water Master Plan, Sewer Master Plan, Master Plan of Drainages, and Urban Water Management Plan. Impacts from the BCSP are addressed in part based on the following technical reports:

- Water System Utility Impact Study for the Brea Core Specific Plan prepared by Harris & Associates included as Appendix J to this Program Environmental Impact Report (PEIR)
- Sanitary System Utility Impact Study for the Brea Core Specific Plan prepared by Harris & Associates included as Appendix K to this PEIR
- Drainage System Study for the Brea Core Specific Plan prepared by Harris & Associates included as Appendix L to this PEIR
- Water Supply Assessment for the Brea Focused General Plan Update and Brea Core Specific Plan prepared by Harris & Associates included as Appendix M to this PEIR

4.15.1 Environmental Setting

The following sections describe the environmental setting for the Proposed Project as it relates to utilities and service systems.

4.15.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address utilities and service systems.

Federal

Federal Safe Drinking Water Act

The Safe Drinking Water Act, the principal Federal law intended to ensure safe drinking water to the public, was enacted in 1974 and has been amended several times since it came into law. The act authorizes the U.S. Environmental Protection Agency (USEPA) to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and human-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resources Control Board conducts most enforcement activities. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers.

Clean Water Act

The Federal Clean Water Act (CWA), U.S. Code, Title 33, Section 1251 et seq., establishes regulations to control the discharge of pollutants into the waters of the United States and regulates water quality standards for surface waters. Under the CWA, the USEPA is authorized to set wastewater standards for industry and runs the National Pollutant Discharge Elimination System (NPDES) permit program. Under the NPDES program, permits are required for all new developments that generate discharges that go directly into waters of the United States. Additionally, Section 1251 et seq. of the CWA requires wastewater treatment of all effluent before it is discharged into surface waters.

National Pollutant Discharge Elimination System

Under the NPDES program (under Section 402 of the CWA), all facilities that discharge pollutants from any point source into waters of the United States must have a NPDES permit. The term "pollutant" broadly applies to any type of industrial, municipal, and agricultural waste discharged into water. Point sources can be publicly owned treatment works (POTW), industrial facilities, and urban runoff. The NPDES program addresses certain agricultural activities, but the majority are considered nonpoint sources and are exempt from NPDES regulation. Direct sources discharge directly to receiving waters, and indirect sources discharge to POTWs, which in turn discharge to receiving waters. Under the national program, NPDES permits are issued only for indirect dischargers. Municipal sources are POTWs that receive primarily domestic sewage from residential and commercial customers. Specific NPDES program areas applicable to municipal sources are the National Pretreatment Program, the Municipal Sewage Sludge Program, Combined Sewer Overflows, and the Municipal Storm Water Program. Nonmunicipal sources include industrial and commercial facilities. Specific NPDES program areas applicable to these industrial/commercial sources are Process Wastewater Discharges, Nonprocess Wastewater Discharges, and the Industrial Storm Water Program. NPDES issues two basic permit types: individual and general. Also, the USEPA has recently focused on integrating the NPDES program further into watershed planning and permitting direct, point-source discharges. The watershed-based permitting approach integrates various CWA programs, such as NPDES, at the watershed level to improve efficiency and meet water quality goals by considering cumulative impacts.

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the U.S. Department of Transportation (DOT) to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. DOT's Pipeline and Hazardous Materials Safety Administration develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6 million miles of pipelines. DOT and Pipeline and Hazardous Materials Safety Administration regulations governing natural gas

transmission pipelines, facility operations, employee activities, and safety are in the Code of Federal Regulations (CFR)—49 CFR Parts 190 through 192, 49 CFR Part 195, and 49 CFR Part 199.

Pipeline Safety Improvement Act of 2002

The Pipeline Safety Improvement Act mandates that the DOT, the Department of Energy, and the National Institute of Standards and Technology in the Department of Commerce carry out a program of research, development, demonstration, and standardization to ensure the integrity of pipeline facilities. The purpose of the program is to identify safety and integrity issues and develop methodologies and technologies to characterize, detect, and manage risks associated with natural gas and hazardous liquid pipelines.

State

State Water Resources Control Board: Statewide General Waste Discharge Requirements

The General Waste Discharge Requirements specify that all Federal and State agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than 1 mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California need to develop a sewer master plan. The plan evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities to maintain proper levels of service. The master plan includes inflow and infiltration studies to analyze flow monitoring and water use data, a capacity assurance plan to analyze the existing system with existing land use and unit flow factors, a condition assessment and sewer system rehabilitation plan, and a financial plan with recommended capital improvements and financial models.

General Pretreatment Regulations for Existing and New Sources of Pollution

The General Pretreatment Regulations establish responsibilities of the Federal, State, and local government; industry; and the public to implement National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in POTWs or that may contaminate sewage sludge. Pretreatment standards are pollutant discharge limits that apply to industrial users.

California Green Building Standards Code

California Code of Regulations, Title 24, Part 11, is referred to as the California Green Building Standards Code (CALGreen) went into effect in January 2011. The most recently approved update to CALGreen became effective January 1, 2025, and is applicable to the planning, design, operation, construction, use, and occupancy of newly constructed buildings and structures throughout the State of California.

CALGreen, Chapter 5, Division 5.3, Water Efficiency and Conservation, establishes provisions to conserve water used indoors, outdoors, and in wastewater conveyance in non-residential development. The intent is to encourage voluntary reduction of potable water use in new or altered buildings by making building owners and tenants aware of their daily potable water consumption. When the meters are installed, the building operator would have the ability to establish a water consumption baseline to monitor future water use.

CALGreen, Chapter 4, Division 4.3, Water Efficiency and Conservation, establishes provisions to conserve water used indoors (e.g., water closets, urinals, showerheads, and faucets), outdoors such as landscape areas, and in water reuse systems in residential development.

CALGreen Section 5.408.1 requires that 65 percent of construction and demolition waste be diverted from landfills and that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting from land clearing shall be reused or recycled.

Appliance Efficiency Regulations

California's Appliance Efficiency Regulations (California Code of Regulations [CCR] Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. The standards are designed to reduce Statewide energy and water demand, lower greenhouse gas emissions, and support the State's overall energy conservation goals. The regulations also include requirements for appliance certification, labeling, and compliance verification to ensure that products meet California's efficiency criteria before entering the market. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

Urban Water Management Planning Act (California Water Code, Division 6, Part 2.6, Section 10610 et seq.)

The Urban Water Management Planning Act was developed due to concerns for potential water supply shortages throughout California. It requires information on water supply reliability and water use efficiency measures. Urban water suppliers are required, as part of the act, to develop and implement Urban Water Management Plans (UWMP) to describe their efforts to promote the efficient use and management of water resources.

Senate Bill 610

Senate Bill (SB) 610 requires that any city or county that determines that a project is subject to the California Environmental Quality Act (CEQA) under Section 21080 of the Public Resources Code prepare a Water Supply Assessment (WSA) to determine the sufficiency of water supply to meet water demand during normal, single dry, and multiple dry water years over a 20-year projection period.

Assembly Bill 939: California Integrated Waste Management Act

The California Integrated Waste Management Act was enacted by the California Legislature in 1989 (AB 939) with the goal of reducing dependence on landfills for the disposal of solid waste and to ensure an effective and coordinated system for the safe management of all solid waste generated within the State. Assembly Bill (AB) 939 mandated a reduction in the amount of solid waste disposed of by jurisdictions and required diversion goals of 25 percent by 1995 and 50 percent by the year 2000. The Integrated Waste Management Act established a hierarchy of preferred waste management practices, which include (1) source reduction, (2) recycling and composting, and (3) environmentally safe disposal by transformation or landfilling. It addresses the aspects related to solid waste regulation, including the details regarding the lead enforcement agency's requirements and responsibilities; the permit process, including inspections and denials of permits; enforcement; and site cleanup and maintenance. AB 939 required cities and counties to divert a minimum of 50 percent of all solid waste from landfill disposal.

Mandatory Commercial Recycling Program

In 2011, the California Legislature enacted AB 341 (California Public Resources Code, Section 42649.2), increasing the diversion target to 75 percent Statewide. AB 341 also requires the provision of recycling service to commercial and residential facilities that generate 4 cubic yards (cy) or more of solid waste per week. AB 341 also requires a business (defined to include a commercial or public entity) that generates more than 8 cy of commercial solid waste per week or is a multi-family residential dwelling of five units or more to arrange for recycling services.

California Public Utility Commission

The California Public Utilities Commission regulates privately owned telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation companies, in addition to authorizing video franchises. Among the commission’s goals for energy regulation are: establish service standards and safety rules, authorize utility rate changes, oversee markets to inhibit anti-competitive activity, prosecute unlawful utility marketing and billing activities, govern business relationships between utilities and their affiliates, resolve complaints by customers against utilities, implement energy efficiency and conservation programs and programs for low-income individuals and people with disabilities, oversee the merger and restructure of utility corporations, and enforce the CEQA for utility construction.

California Energy Commission

The California Energy Commission (CEC) was created in 1974 as the State’s principal energy planning organization to meet the energy challenges facing the State in response to the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing State energy policy:

- Forecast Statewide electricity needs.
- License power plants to meet those needs.
- Promote energy conservation and efficiency measures.
- Develop renewable energy resources and alternative energy technologies.
- Promote research, development and demonstration.
- Plan for and direct the State's response to energy emergencies.

Regional

Orange County Sanitary District Reclamation Plants NPDES Permit

Wastewater discharge requirements for Orange County Sanitary District (OCSD) Reclamation Plants No. 1 and No. 2 are detailed in Order No. R8-2021-0010 issued on June 23, 2021. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The permit includes limitations more stringent than applicable Federal technology-based requirements where necessary to achieve the required water quality standards.

Orange County Sanitation District Capital Facilities Charges

The OCSD Capital Facilities Charge (Ordinance No. OCSD-40) is imposed when a property newly connects to the OCSD system or a previously connected property expands its use. Revenue generated from the charge is used for the acquisition, construction, and reconstruction of OCSD's wastewater collection, treatment, and disposal facilities; to repay principal and interest on debt instruments; or to repay Federal or State loans for the construction and reconstruction of sewage facilities, together with costs of administration and provisions for necessary reserves.

Orange County Sanitation District Ordinance Nos. 25 and 48

OCSD Ordinance OCSD-25 sets forth some prohibitions on activities by food service establishments to minimize discharges of fat, oils, and grease to sewers. OCSD Ordinance OCSD-48 sets limits on wastewater that is discharged to sewers and conveyed to OCSD wastewater treatment plants. The ordinance limits concentrations of certain substances, including metals, some hazardous materials such as pesticides, and oil and grease (petroleum derived).

Local

2003 Brea General Plan

2003 Brea General Plan, Chapter 2, Community Development, includes goals and policies to support new development with respect to the City of Brea's (City) water, sewer, and storm drain systems. Applicable policies include:

- **Policy CD-14.1** Coordinate the demands of new development with the capacity of water and sewer systems.
- **Policy CD-14.3** Require that new developments fund fair-share costs associated with City provision of water, sewer, and storm drain service.

Brea City Code

The Brea City Code (BCC) Title 13, Utilities, provides provisions for when connection with City utility lines are required, including but not limited to sewer, underground utilities, water, and storm water drainage.

City of Brea Urban Water Management Plan

The City adopted their UWMP in April 2016 and subsequently updated it in 2020. The UWMP provides information on present and future water demand and supplies and assesses the City's water resource reliability over the next 25 years. It also acts as a guide to maintain efficient use of urban water supplies, promote conservation programs and policies, and proactively plan and update the City's strategies to address potential water shortages and drought conditions.

The UWMP addresses water-planning fundamentals by:

- Preparing a detailed look at current and future water use, including assessing baseline data and examining other long-term planning documents for the region.
- Analyzing potable and non-potable water supplies, reviewing water rights and contracts, ascertaining restrictions on water availability under certain regulatory and hydrological conditions, and assessing seismic risk to various water system facilities.
- Reviewing the range of potential impacts of climate change on water demand and supply.
- Analyzing water supply reliability by integrating the water use analyses with the water supply analyses to provide a water service reliability picture under normal conditions, single dry-year conditions, and 5 consecutive dry-years through the year 2045.
- Preparing a Drought Risk Assessment by including integrated water supplies and projected water use in a hypothetical 5-year drought condition.
- Developing a Water Shortage Contingency Plan that specifies opportunities to reduce demand and augment supplies under numerous water shortage conditions.

The UWMP includes general growth rates for commercial, industrial, and public water connections. However, these growth rates do not correspond to the Focused GPU so a full WSA is included herein.

City of Brea Water Master Plan

In 2021, the City approved a Water Master Plan (2021 WMP) that details the water system infrastructure improvements necessary to meet current system deficiencies, enhance system

reliability, and increase capacity to provide service to the City's customers as the systems grow into the future. The WMP analyzes the City's water system by reviewing the inventory of existing infrastructure, identifying capacity issues, and forecasting future development projects. Based on this information, the WMP models the water system to provide findings, conclusions, and recommendations on Capital Improvement Projects necessary to maintain the City's reliability in delivering potable water. These plans detail the infrastructure improvements necessary to meet current system deficiencies, enhance system reliability, and increase capacity to provide service to the City's customers as the water and sewer systems grow into the future.

City of Brea Sewer Master Plan

In 2021, the City approved a Sewer Master Plan (2021 SMP) that details the sewer system infrastructure improvements recommended to meet current system deficiencies, enhance system reliability, and increase capacity to provide service to the City's customers as the systems grow into the future. Future planning data was used to estimate future sewer loads and size future sewer facilities. The 2021 SMP identifies existing and future capacity deficiencies and recommends necessary improvement projects.

City of Brea Master Plan of Drainage

In 2013, the City finalized its Master Plan of Drainage (2013 MPD). This document inventories existing drainage facilities, identifies deficiencies, and recommends improvements. The recommended drainage improvements are ranked based on risk and have an associated estimated budget. The 2013 MPD is used to inform Citywide drainage planning and capital improvements.

City of Brea Water Ordinance 1221

The City adopted the Water Shortage Contingency Response Ordinance 1221 on June 1, 2021. It establishes water management requirements necessary to conserve water, enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, prevent unreasonable use of water, and prevent unreasonable method of use of water within the City to assure adequate supplies of water to meet the needs of the public and further the public health, safety, and welfare, recognizing that water is a scarce natural resource that requires careful management not only in times of drought, but at all times. It also establishes restrictions to be implemented during times of declared water shortages or declared water shortage emergencies.

Construction and Demolition Waste Management Ordinance

The City's Construction and Demolition Waste Management Ordinance requires a minimum of 65 percent of construction and demolition waste to be diverted from landfills through recycling or reuse. Projects must submit a Construction and Demolition Waste Management Plan and a final Compliance Report. The Construction and Demolition Waste Management Plan is required before a permit can be issued, and the compliance report is needed before project completion.

4.15.1.2 Existing Conditions

Focused General Plan Update

Water System

The City's Water Division is responsible for the City's potable water system, including backflow prevention and water quality issues. The Water Division serves all the City's area with the following exceptions:

- The City serves one residence on Vesuvius Drive and nine residences on Spurr Circle within the Vesuvius tract.
- The remainder of residences in the Vesuvius tract are served by Yorba Linda Water District.

The City's distribution system consists of 217 miles of pipeline and seven storage reservoirs with a combined storage capacity of 69.5 million gallons (mg). The system also includes five booster pump stations with a total pumping capacity of approximately 14,800 gallons per minute (gpm), 18 pressure zones, 97 pressure-reducing stations to regulate 18 pressure zones, an irrigation well, a total of four connections with Metropolitan Water District of Southern California (MWD) and California Domestic Water Company (CDWC), and 5 emergency interconnections (City of Brea 2021a). Figure 4.15-1, Existing Water System, shows the City's existing waster distribution system, including but not limited to water pressure zones, water pipeline locations, and active water valve locations.

In 2024, the City served 12,946 municipal connections that supplied 8,995 acre-feet (af) of water. The City also manages an irrigation well located at the Brea Creek Golf Course that pumps up to 450 gpm to serve the golf course.

Water Supply

The City's water supply includes imported groundwater and surface water, as well as its own groundwater supply. The City is physically located above the La Habra Groundwater Basin, but imports most of its water from the adjacent Main San Gabriel Basin, provided by CDWC. The City also pumps groundwater from the La Habra Groundwater Basin, which provides non-potable water from one well for agricultural purposes only. As needed, the City may import surface water from the Colorado River and State Water Project provided by MWD via Metropolitan Water District of Orange County.

Ninety-nine percent of the City's water is from the CDWC, which provides water from the Main San Gabriel Basin. The City also pumps groundwater from the La Habra Groundwater Basin, which provides non-potable water from one well for agricultural purposes only. According to the

City's 2020 UWMP, the reasonable available volume of CDWC water is 9,000 acre-feet per year (AFY). If the City requires additional potable water, it is sourced from MWD.

Wastewater

The City provides local sewage collection within the City's corporate boundaries, as well as portions of unincorporated Orange County and a small portion of Placentia. The gravity system consists of approximately 134 miles (708,750 feet) of pipe, the majority of which is vitrified clay pipe ranging from 8 to 27 inches in diameter. Figure 4.15-2, Existing Sewer System, shows existing pipeline locations and sewersheds. The sewer service area is divided into 11 major sewersheds that flow into City's trunk sewers, which in turn, outlet to OCSD facilities. According to the 2021 SMP the City's average daily wastewater flow is approximately 4.88 million gallons per day (mgd) (City of Brea 2021b).

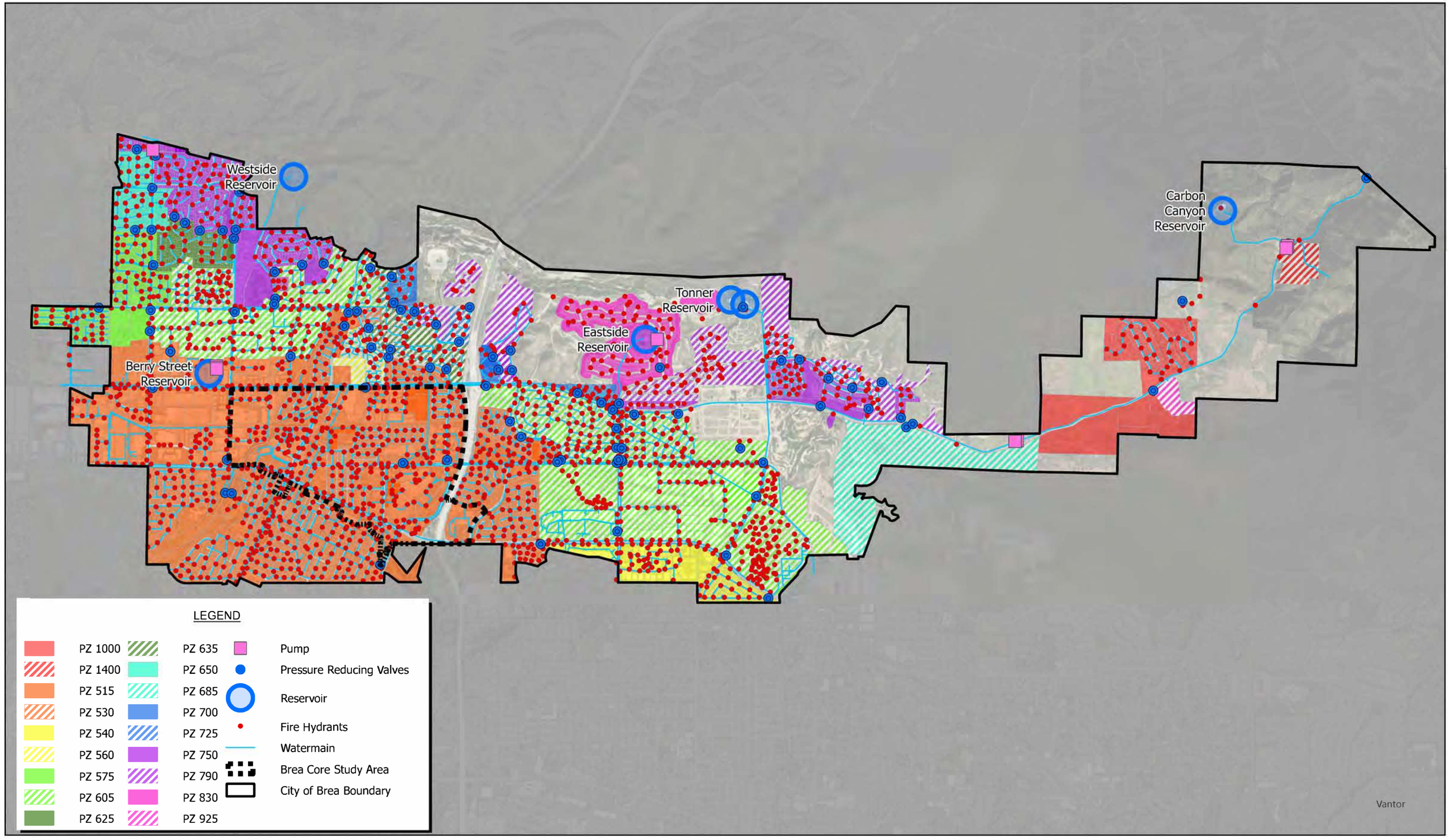
The City's 2021 SMP evaluated the existing sewer system capacity based on estimated peak dry weather flow (PDWF) and identifies three capacity deficiencies as described below and shown on Figure 4.15-3, Sewer Master Plan Capacity Deficiencies. A pipe segment is considered hydraulically deficient when the ratio of depth of flow to pipe diameter (d/D) during PDWF exceeded 0.64:

- **Existing Conditions:** A total of 749 feet of capacity deficiencies were identified under existing conditions. They are identified as Location EX1 and Location EX2 on Figure 4.15-3.
- **Near-Term Future Conditions:** A total of 1,487 feet of capacity deficiencies were identified based on near-term future development. They are identified as Location FUT1 and Location FUT2 on Figure 4.15-3.
- **Future Conditions:** A total of 19,985 feet of capacity deficiencies were identified under future conditions. They are identified as Location SOI Fullerton Brea and Location SOI Carbon Canyon on Figure 4.15-3.

Note that in the 2021 SMP, "near-term development" refers to projects in various planning stages at the time of master plan preparation, including five under-construction projects, seven approved (entitled) projects, and eight projects under entitlement review, generating approximately 1.1678 million gallons per day (mgd) of average dry weather flow (ADWF) (as shown in Table 5-1, Future Development, of the 2021 SMP); "future development" refers to additional buildout within the Sphere of Influence (SOI), including development in the Carbon Canyon sewershed, generating approximately 2.8185 mgd of ADWF. These assumptions are summarized in Table 5-2, SOI Development and Carbon Canyon Future Development, of the 2021 SMP.

Orange County Sanitation District

OCSD collects sewage from cities throughout Orange County and treats it at regional facilities. OCSD provides wastewater collection, treatment, and disposal services for approximately 2.5 million people in central and northwest Orange County, including in the City.



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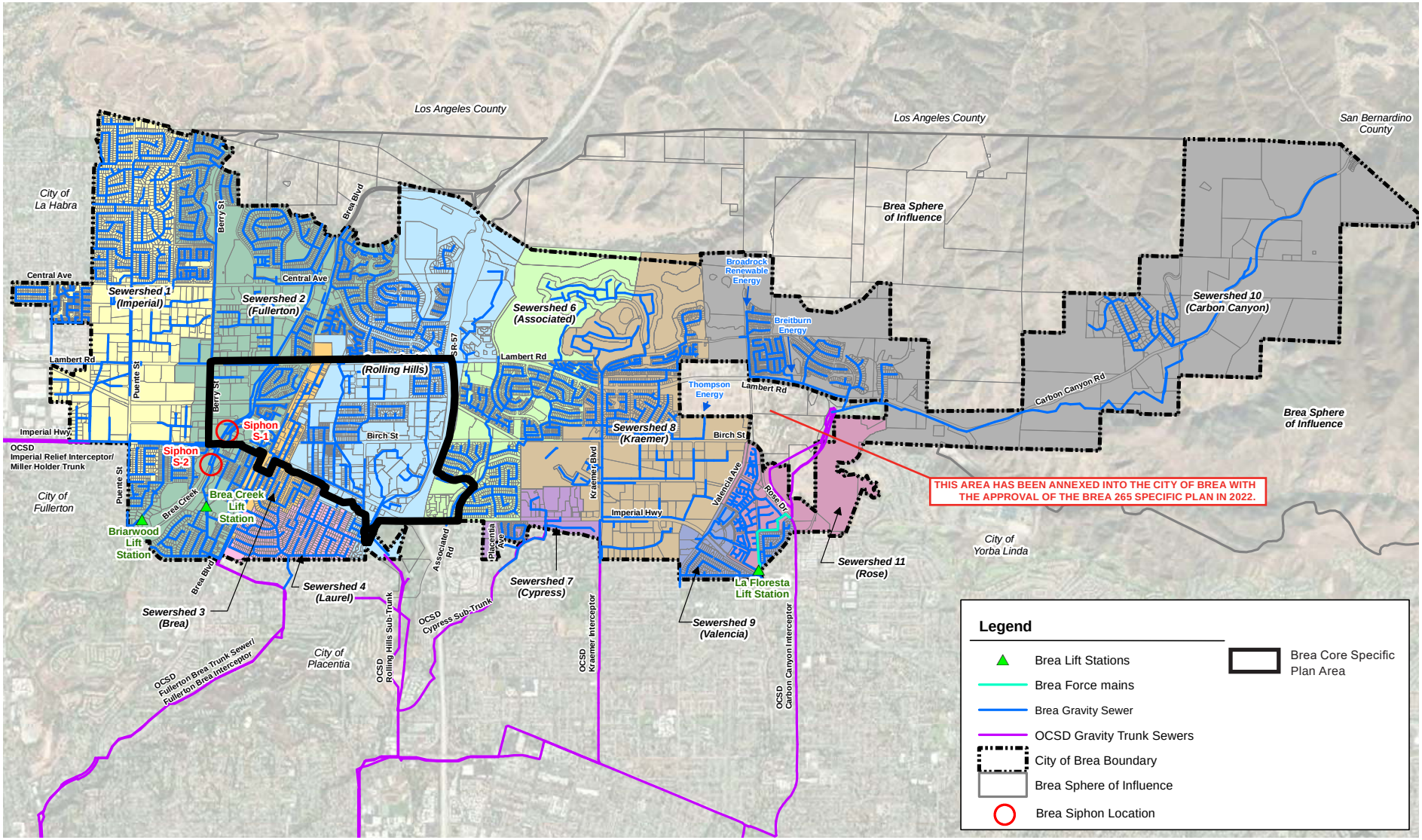
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Figure 4.15-1

Existing Water System

Brea 2050: Focused General Plan Update and Brea Core Specific Plan

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Source: AKM, 2021; City of Brea, 2021.

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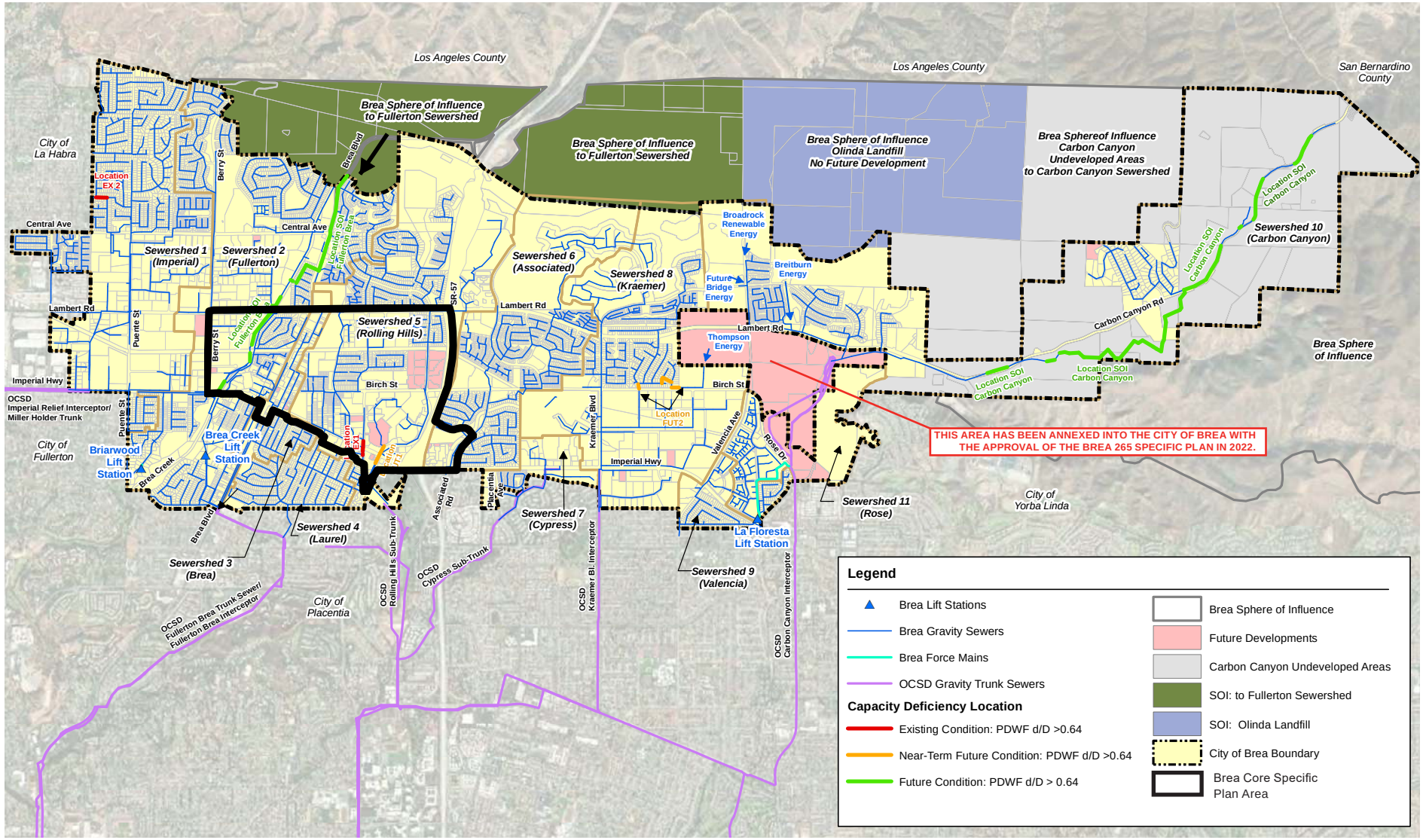
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Figure 4.15-2

Existing Sewer System

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Source: AKM, 2021; City of Brea, 2021.

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Figure 4.15-3

Sewer Master Plan Capacity Deficiencies

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OCSD service area is composed of 20 cities, unincorporated areas, and four special districts, and divided into 11 sewersheds. Sewage is conveyed from local collection systems operated by these cities and special districts through a Sanitation District trunk network featuring 389 miles of pipe, which carry effluent to two regional wastewater treatment plants: Reclamation Plant No. 1 (Plant 1) at 10844 Ellis Avenue in Fountain Valley and Treatment Plant No. 2 (Plant 2) at 22212 Brookhurst Street in Huntington Beach, which are 109 acres and 111 acres, respectively. The two treatment plants receive wastewater from 11 major trunk sewers supported by 15 sewage-pumping facilities (Dudek 2020). The combined maximum secondary treatment capacity of both Plant No. 1 and Plant No. 2 is 332 million gallons per day (mgd), and the combined average daily intake is 184 mgd (116 mgd at Plant No. 1 and 68 mgd at Plant No. 2) (Dudek 2020).

Furthermore, OCSD supplies the Orange County Water District with 130 million gallons a day of treated wastewater that is reclaimed and reused for treatment processes and landscaping, injected into the seawater intrusion barrier to protect groundwater, and used for the Groundwater Replenishment System.

Stormwater

The City elevations, above mean sea level, vary from a minimum of 282 feet to a maximum elevation of 1,379 feet. The south and west areas of the City are generally flatter terrain with increasingly steeper hillside areas in the north and eastern areas. Five regional drainage boundaries overlie the City's boundaries and flow into Orange County Flood Control District (OCFCD) facilities. These include Coyote Creek, Imperial Creek, Brea Creek, Fullerton Creek and Carbon Creek. These major watersheds are depicted on Figure 4.9-2, Major Drainage Areas. In the higher elevations (northerly and easterly), runoff is characterized by overland flow in hilly terrain, whereas runoff in lower elevations occurs in a suburban setting through streets and 53.5 miles of constructed storm drain conduits and trapezoidal channels. Within the developed areas of the City, stormwater is conveyed within curbs and gutters to catch basins and occasionally sumps prior to entering storm drain conduits. Stormwater runoff flows generally in a southwesterly direction through the City. Some of the stormwater flowing through the City originates also in the unincorporated Orange County area, the County of Los Angeles, and the County of San Bernardino. Four of five regional drain facilities convey runoff flows southwesterly to the Coyote Creek Channel (along the County's westerly boundary). The fifth regional drain (Carbon Creek) carries drainage southerly through the Carbon Canyon Diversion Channel to the Santa Ana River.

The City's storm drain system encompasses approximately 53.5 miles of pipe, pipe size ranging from 8 inches to 78 inches, and over 1,000 manholes/structures. There is no pump station in the existing system. There are Caltrans drainage facilities which are part of the SR-57 freeway, SR-142 Carbon Canyon Road, and SR-90 Imperial Highway improvements within the City (City of Brea 2013). Figure 4.15-4, Existing Drainage System, illustrates existing drainage system within the City boundaries. According to the 2013 MPD, the majority of existing storm drain improvements were

constructed between the years 1960 and 1990, most of the pipes are reinforced concrete pipe. The 2013 MPD assumed that service life for the typical reinforced concrete pipe material to be 75 years, and corrugated metal pipe material to be 45 years. Therefore, the 2013 MPD indicated that consideration should be given to developing a scheduled internal inspection program, such as closed circuit television (CCTV) inspection and personal inspection reports, followed by a drainage assess rehabilitation or replacement plan as recommended by findings. This plan was recommended to be incorporated into the next MPD update or as a supplement.

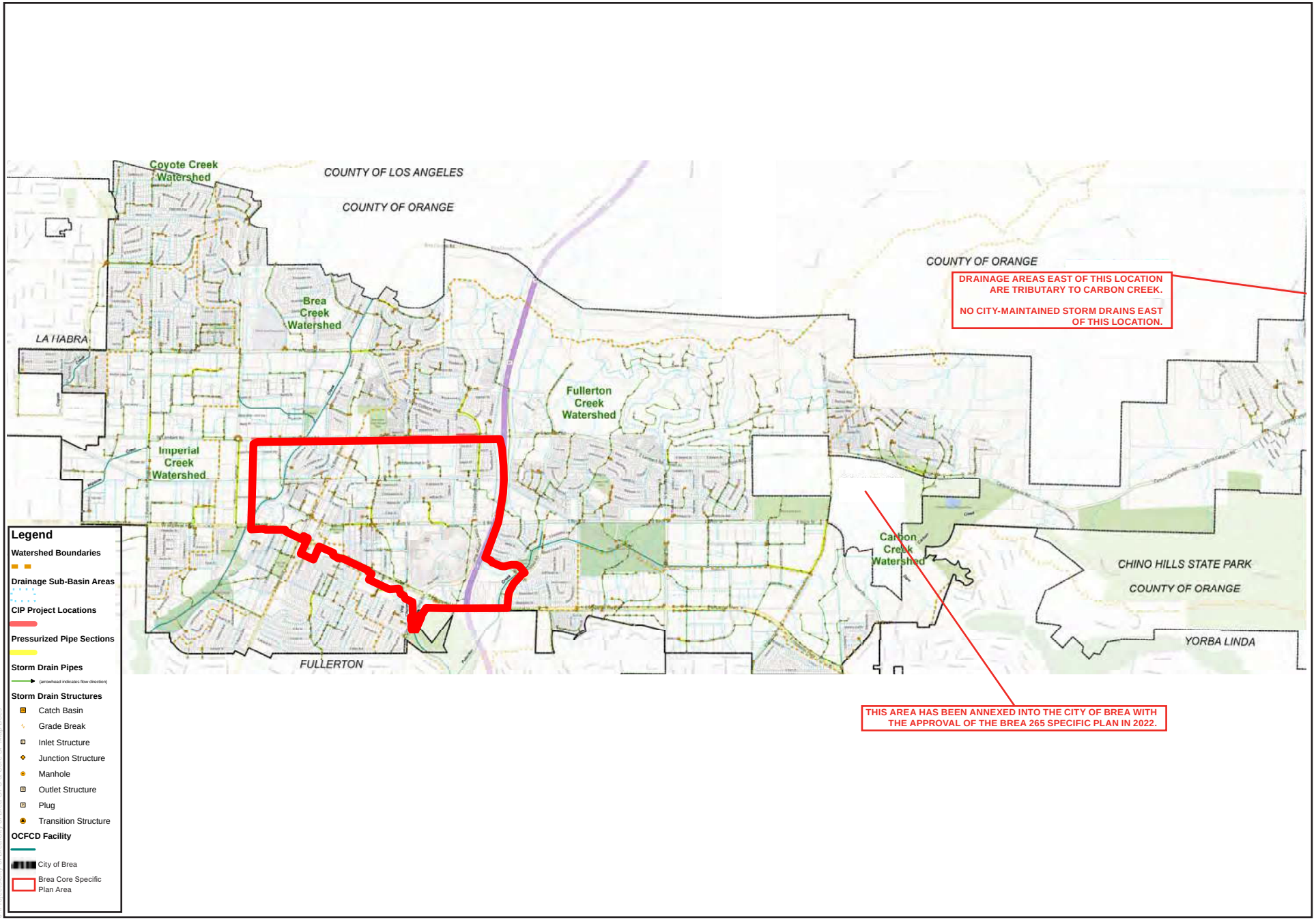
The 2013 MPD indicates that approximately 6.9 percent of the existing drainage system has deficient design capacity for conveying stormwater runoff produced by a ten-year design storm event. Specifically, 21 storm drain pipe segments were identified as over design capacity to some degree. However, this does not mean the pipe segments are spilling water back into the streets, but they are flowing under slight pressure which may become a future concern. Additionally, there are three known recurring water ponding locations along Lambert Road as shown on Figure 4.15-5, Existing Drainage System Deficiencies, and the open channel and 84-inch inlet structure in the northwest quadrant of Northwood Avenue and La Canada Drive requires regular debris removal. Although this open channel was not identified as being capacity deficient, further evaluation for an upstream solution in the interest of reducing overflow risk potential due to debris accumulation.

Natural Gas

Southern California Gas Company (SoCalGas) provides gas service in the City. The service area of SoCalGas spans much of the central and Southern California, from all or portions of Los Angeles, Orange, Riverside, San Bernardino, San Diego, Ventura, Santa Barbara, Kern, Tulare, Kings, and Fresno Counties, as well as parts of Imperial and San Luis Obispo Counties. SoCalGas's service territory encompasses a diverse range of urban, suburban, and rural communities and includes major metropolitan regions, including Orange County. SoCalGas owns and operates an extensive network of natural gas transmission and distribution pipelines, compressor stations, underground storage fields, and related infrastructure for reliable delivery of natural gas to residential, commercial, and industrial customers within its service area.

Electricity

The City is in Southern California Edison's (SCE) service area, which spans much of Southern California from Orange and Riverside counties on the south to Santa Barbara County on the west to Mono County on the north.



Source: City of Brea, 2013.

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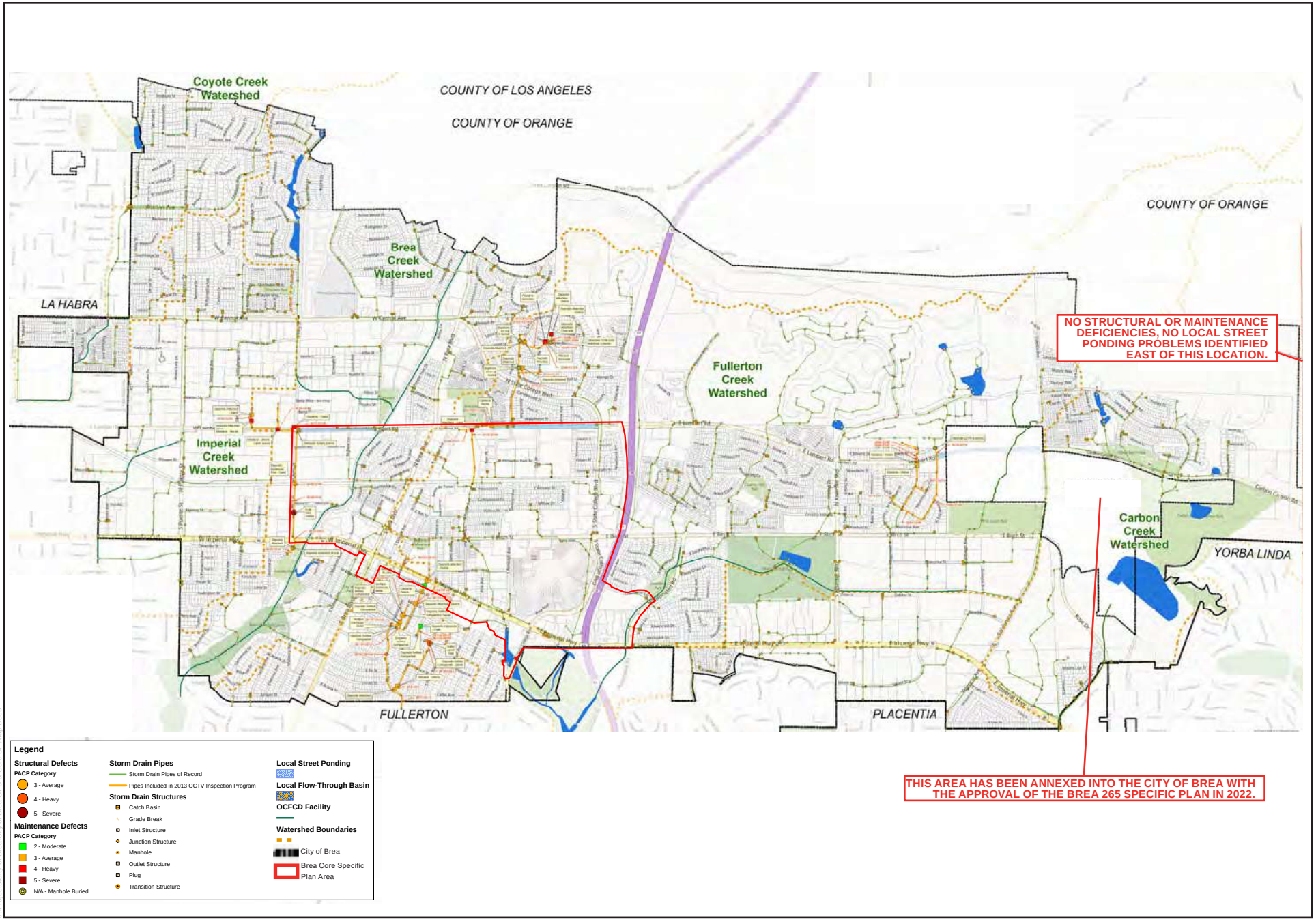
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Figure 4.15-4

Existing Drainage System

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Source: City of Brea, 2013.

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Figure 4.15-5

Existing Drainage System Deficiencies

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Solid Waste and Recycling

The City contracts with Republic Services, also known as Brea Disposal, for trash service and collection. The collected wastes are consolidated and sorted at local transfer stations and transported to disposal sites. Once the materials recovery facility processes solid waste from recyclables, the recovered recyclable materials are bundled and transferred for immediate shipment to domestic and international markets. Nonrecyclable waste is moved to solid waste transfer operation for final processing and consolidation before delivery to landfills.

Solid waste landfill capacity is provided to Brea by OC Waste & Recycling. Orange County owns and operates three active landfills: Olinda Alpha Landfill at 1942 North Valencia Avenue in Brea; Frank R. Bowerman Landfill at 11002 Bee Canyon Access Road in Irvine; and Prima Deshecha Landfill at 32250 La Pata Avenue in San Juan Capistrano. The waste generated by the City is taken to the Olinda Alpha Landfill. The Olinda Alpha Landfill accepts a maximum of 8,000 tons per day and currently receives an average of approximately 7,000 tons per day. The landfill had an estimated remaining capacity of approximately 17.5 million cubic yards as of 2020 (CalRecycle 2025a). To ensure that the maximum permitted daily tonnage at a particular landfill is not exceeded, waste haulers can be diverted to another OC Recycling landfill or one of the transfer stations throughout the County.

Based on the most recent data available, the average disposal rates for the City for 2023 were 8.3 pounds per day per resident and 8.3 pounds per day per employee (CalRecycle 2025b). Table 4.15-1, Solid Waste Generation – Existing Conditions, shows the existing solid waste generation using these generation rates. As shown in Table 4.15-1, the City currently generates approximately 817,733 pounds per day (lbs/day) of solid waste.

Table 4.15-1. Solid Waste Generation – Existing Conditions

Total Population	Solid Waste Generation Rate (lbs/resident/day)	Solid Waste Generation (lbs/day)	Total Jobs	Solid Waste Generation Rate (lbs/employee/day)	Solid Waste Generation (lbs/day)	Total Solid Waste Generation (ld/day)
46,585	8.3	386,656	51,937	8.3	431,077	817,733

Source: CalRecycle 2025b.
Notes: lb/day=pounds per day

Brea Core Specific Plan

Water

The BCSP area is served by the City's public water system, which receives imported water from the CDWC and the Metropolitan Water District of Orange County. The BCSP area lies within the City's Pressure Zone 515, which is supplied by the Berry Street Pump Station—pumping from the Berry Street Reservoir—and by pressure-reducing valves connected to higher-pressure zones. Figure 4.15-6, Water System within the Brea Core Specific Plan Area, illustrates the existing water infrastructure serving the area.

According to the City's 2021 WMP, the water system within the BCSP area meets most of the City's design criteria. While no deficiencies were identified with respect to pressure, velocity, water supply, fire flow, or storage capacity, a pumping capacity deficiency was identified at the Berry Street Booster Pump Station. The Berry Street Booster Pump Station provides service to both Pressure Zone 515 and Pressure Zone 790 through zone-specific pumps. To address this deficiency and aid in meeting the dependent maximum day demand (MDD) in both the 790 and 515 pressure zones, the 2021 WMP recommends installing an additional low-pressure pump for the 515 pressure zone at the Berry Street Booster Pump Station with a minimum capacity of 1,424 gpm, and installing an additional high-pressure pump for the 790 pressure zone at the Berry Street Booster Pump Station with a minimum capacity of 1,191 gpm.

Water Supply

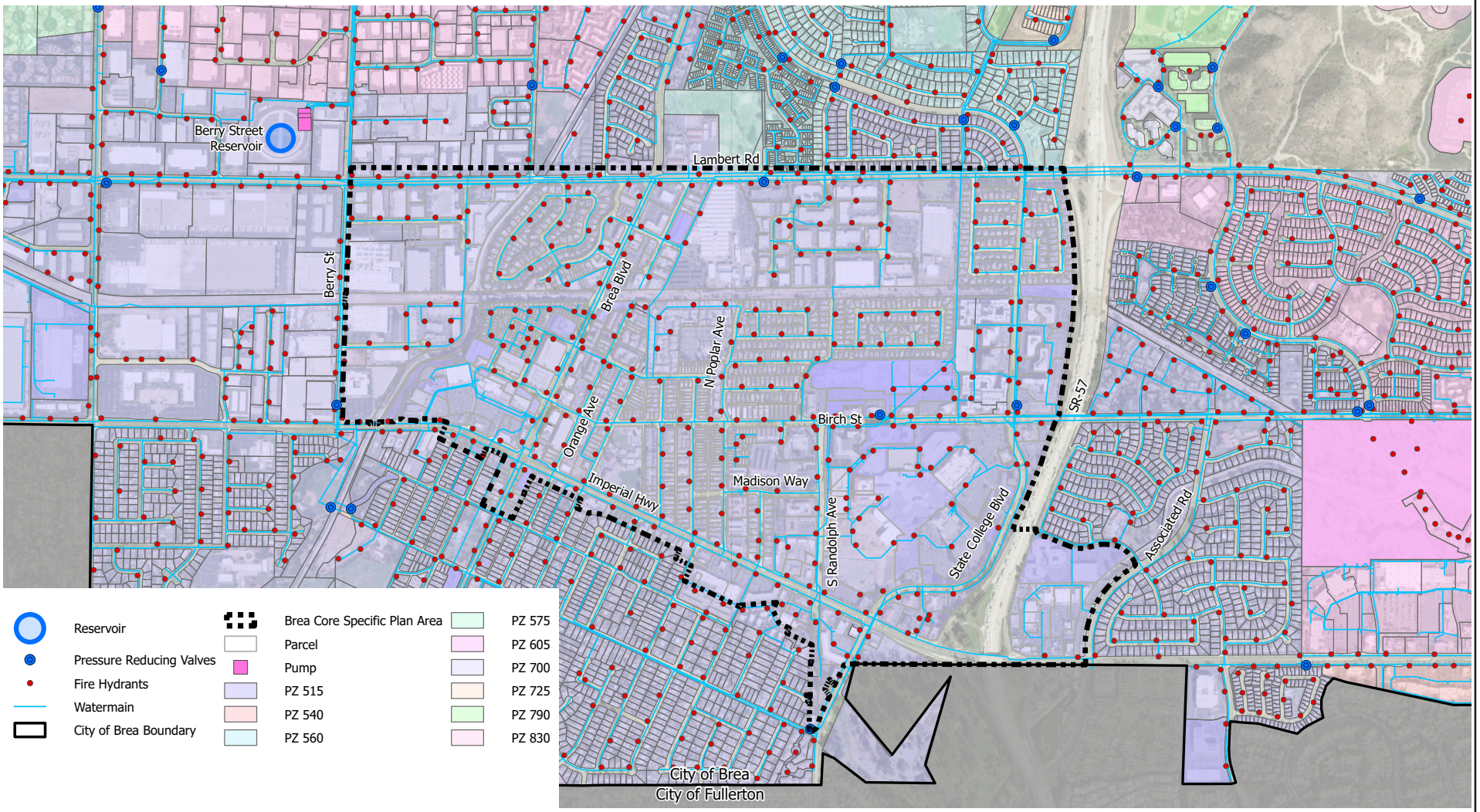
Refer to the Water Supply discussion for the Focused GPU above.

Wastewater

The BCSP area is served by the City's public sewer system, which consists primarily of gravity pipelines and one inverted siphon. Flows generally move in a southerly direction toward OCSD trunk sewers. Most local sewer lines are 8-inch vitrified clay pipe. The inverted siphon is a 10-inch vitrified clay pipe segment that crosses beneath the Brea Creek Channel for approximately 110 feet, flowing east to west. Figure 4.15-7, Sewer System within the Brea Core Specific Plan Area, illustrates the existing sewer network and sewershed boundaries within the BCSP area.

The BCSP area lies within four of the City's 11 major sewersheds, including Fullerton, Brea, Rolling Hills, and Associated sewershed. The Fullerton and Brea sewersheds discharge to the OCSD Fullerton–Brea Trunk Sewer/Interceptor, and the Rolling Hills and Associated sewersheds discharge to the OCSD Rolling Hills Sub-Trunk/Santa Ana River Interceptor.

According to the 2021 SMP, one pipe segment within the BCSP area—located at Randolph Avenue and Imperial Highway—is identified as operating with a hydraulic deficiency under existing condition (refer to Location EX1 on Figure 4.15-7). However, a field inspection of the siphon conducted as part of the 2021 SMP found no capacity, operation, or maintenance concerns at this location. Additionally, a second hydraulically deficient pipe—located at State College Boulevard and Imperial Highway—is identified within the BCSP area in the 2021 SMP under the near-term scenario (refer to Location FUT1 on Figure 4.15-7).



Source: Willdan Engineering, 2013.

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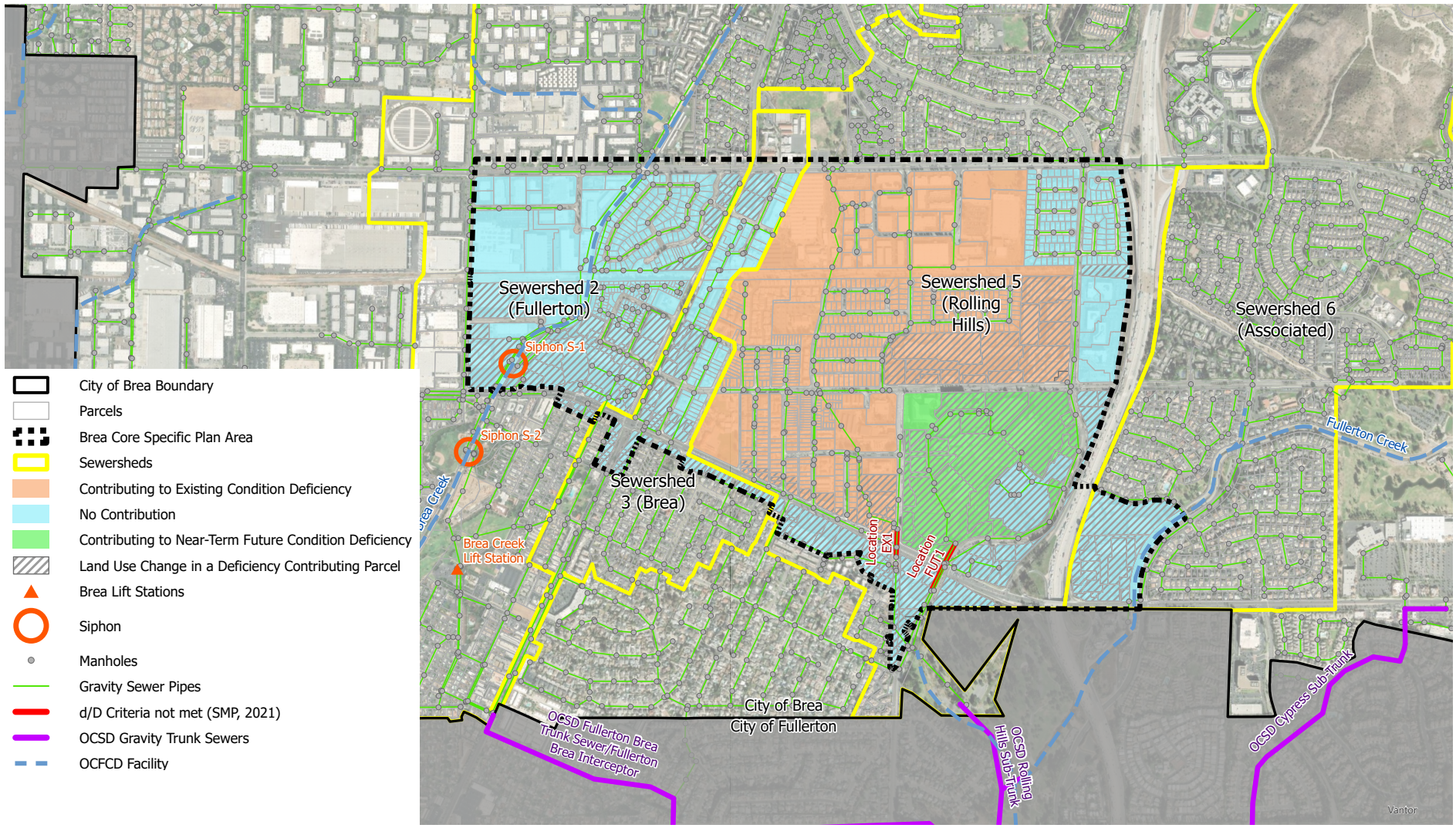
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Figure 4.15-6

Existing Drainage System

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Source: Vantor Imagery, 2021.

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Figure 4.15-7

Sewer System within the Brea Core Specific Plan Area

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Stormwater

The BCSP area is fully urbanized with an existing engineered stormwater drainage system. The BCSP area is primarily divided between the regional watersheds of Brea Creek and Fullerton Creek (Figure 4.9-2). Both creeks, which flow in a southwesterly direction, are managed by the OCFCD. Areas west of North Brea Boulevard drain to OCFCD facilities associated with Brea Creek, while areas east of North Brea Boulevard drain to OCFCD facilities for Fullerton Creek. A small portion along the City's southern boundary—including part of the BCSP area—lies outside the major regional watersheds and drains southward into the City of Fullerton's storm drain system.

The drainage system within the BCSP area consists of a network of City-owned storm drain pipes, manholes, and catch basins that convey flows to the OCFCD systems serving Brea Creek and Fullerton Creek or, in limited areas, to the City of Fullerton's drainage system.

Natural Gas

Refer to the Natural Gas discussion for the Focused GPU.

Electricity

Refer to the Electricity discussion for the Focused GPU.

Solid Waste and Recycling

Refer to Solid Waste and Recycling discussion for the Focused GPU above. The existing solid waste generation rates for the Focused GPU area are inclusive of the BCSP rates.

4.15.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact on utilities and service systems if it would:

- **Threshold UTL-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.
- **Threshold UTL-b:** Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.
- **Threshold UTL-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.

- **Threshold UTL-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.
- **Threshold UTL-e:** Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

4.15.3 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Proposed Project and help reduce or avoid potential impacts related to utilities and service systems:

PPP UTL-1 Development projects are required to comply with the following existing regulations as applicable.

- California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11).
- California Building Energy and Efficiency Standards (Title 24, Part 5), a set of plumbing code requirements that establishes energy and water efficiency standards for new construction, additions, and alterations to existing buildings.
- SB 610 (Chapter 643, Statutes of 2001) and SB 221 (Chapter 642, Statutes of 2001).
- California Green Building Standards Code, Chapter 5, Nonresidential Mandatory Measures, Division 5.3, Water Efficiency and Conservation.
- California Green Building Standards Code, Chapter 4, Residential Mandatory Measures, Division 4.3, Water Efficiency and Conservation.
- Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CCR Part 6)
- California's Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608)
- Senate Bill 1383 (Short-Lived Climate Pollutant Reduction Strategy) and Assembly Bill (AB) 341/AB 1826 (commercial recycling/organics).
- Orange County Municipal Separate Storm Sewer Systems Permit
- Orange County Model Water Quality Management Plan and Technical Guidance Document
- Orange County Drainage Area Management Plan. New Development/ Significant Redevelopment Program
- County of Orange/Orange County Flood Control District Local Implementation Plan

PPP UTL-2 All new development projects are required to pay the City of Brea's latest adopted Water Connections Fees, Water Impact Fees, Sewer Connection Fees, and Sewer Impact Fees (if adopted), with the exception of:

- Alterations to an existing building;
- Reconstruction (within two years), when a building has been destroyed by fire, wind, earthquakes, vandalism, or other natural or man-made disasters;
- Additions to a single-family or multiple-family residence; and
- Construction of public schools.

The new or updated general plan goals and policies related to utilities and service systems are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the PEIR.

4.15.4 Environmental Impacts

The following sections address various potential impacts relating to utilities and service systems that could result from implementation of the Proposed Project.

4.15.4.1 Threshold UTL-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.

Impact Analysis

Focused General Plan Update

Future developments under the Focused GPU would be expected to connect to the existing water supply system, wastewater infrastructure, existing stormwater infrastructure, electric power, natural gas, and telecommunication facilities.

Water, Wastewater, and Stormwater Drainage

The City's 2021 WMP, 2021 SMP, and 2013 MPD were prepared to address growth anticipated under the 2003 General Plan. These master plans identify existing and projected system deficiencies and recommend improvements needed to maintain adequate levels of service. The Focused GPU includes goals and actions that reinforce the City's commitment to providing adequate water, wastewater, and storm drain capacity as growth occurs.

All individual development projects would undergo the City's development review process and would be required to fund or construct necessary infrastructure improvements consistent with the City's Capital Improvement Program (CIP), which includes upgrades to water, sewer, storm drain, and other public facilities. Although the City has established mechanisms to evaluate system capacity and to plan, fund, and phase new utility infrastructure, identified deficiencies in the 2021 WMP,

2021 SMP, and 2013 MPD require that each development project be reviewed for consistency with these master plans. Projects would also be required to pay applicable development impact fees or fund their fair share of improvements needed to address capacity constraints.

Water

For water infrastructure specifically, fire flow testing and updated hydraulic modeling would be required once detailed development plans become available. Updated modeling would identify required system improvements and associated costs. Based on this information, the City would determine appropriate impact fees or cost-share requirements for new development or redevelopment. Until project-level fire flow testing and hydraulic modeling are completed, impacts on water supply and distribution facilities are considered potentially significant.

Wastewater

As discussed in Section 4.15.1.2, Existing Conditions, the 2021 SMP identified existing, near-term, and future sewer deficiencies. Site-specific sewer analysis would be required as development plans advance. Proposed square footage and dwelling units will need to be compared to existing conditions to determine incremental changes in sewer flows and potential impacts on the public sewer system. Individual projects would be reviewed and processed consistent with BCC Chapter 13.00 (Sewers) and the 2021 SMP. Any deficiency identified during the site-specific sewer analysis would need to be mitigated. Therefore, until project-level sewer analysis is completed, impacts on sewer facilities are considered potentially significant.

Storm Drain

Buildout of the Focused GPU is not anticipated to substantially increase impervious coverage or alter the drainage patterns assumed in the 2013 MPD, as the 2013 MPD already accounted for land uses designated in the 2003 General Plan. Most of the land use changes would occur within the BCSP area and the Mixed Use 50 land use areas (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of the PEIR). These areas are already developed with impervious surfaces, and increased land use density is not expected to increase overall impervious surface area or peak runoff rates.

As discussed in Section 4.15.1.2, the 2013 MPD identified existing deficient pipes and localized water ponding during storm events. Causes of deficiencies in the storm drain system include undersized catch basin inlets, undersized catch basin laterals, undersized mainlines, and street slopes flatter than the desired minimum. To address these deficiencies, the 2013 MPD identified drainage facility improvement projects, various design features, and financial strategies.

Each new development would comply with the NPDES Construction General Permit and implement BMPs and low-impact development measures, as specified in a Water Quality

Management Plan, to minimize effects on regional hydrology, including runoff flow rates and velocities. As buildout progresses, the City would continue to maintain and improve its drainage infrastructure in accordance with the 2013 MPD and its CIP for drainage facilities. Additionally, the City would continue to coordinate with the OCFCD for maintenance and long-term planning of regional drainage facilities that traverse the Proposed Project area or are located downstream.

Future development compliance with existing stormwater management regulations, along with continued master planning for the Citywide drainage system, would ensure that buildout of the Proposed Project area does not substantially increase the rate or amount of surface runoff such that it would exceed the capacity of the drainage system. Therefore, impacts would be less than significant.

Electric, Natural Gas, and Telecommunication

Future development under the Focused GPU would also require construction or relocation of electrical, natural gas, and telecommunications infrastructure. Although demand for these services would increase compared to existing conditions, new development must comply with applicable provisions of the BCC (Title 13, Utilities); California Building Energy Efficiency Standards; appliance efficiency regulations set forth in Title 20 of the California Administrative Code; and CALGreen requirements. SCE, SoCalGas, and various franchised telecommunications providers are established utility providers with the capacity and operational mechanisms to serve anticipated growth within the Proposed Project area.

Because precise locations and timing of future utility improvements cannot be determined at this programmatic stage, any such improvements would be subject to applicable City and State design standards, permitting requirements, and project-level CEQA review. This subsequent review would identify and mitigate any potential adverse environmental effects. In addition, all development projects would be required to implement PPP UTL-1 and PPP UTL-2.

Level of Significance Before Mitigation: Impacts to water and wastewater systems would be potentially significant without mitigation due to the need for project-level evaluation and improvements. Impacts to stormwater drainage, electric power, natural gas, and telecommunications facilities would be less than significant.

Mitigation Measures: Mitigation Measure MM UTL-1 is required for water and wastewater systems impacts. No mitigation measures are required for stormwater drainage, electricity, natural gas, and telecommunication facilities.

Level of Significance After Mitigation: Implementation of MM UTL-1 would ensure impacts to utilities and service systems are less than significant.

Brea Core Specific Plan

Water Systems

As detailed in the Water System Utility Impact Study for the Brea Core Specific Plan (refer to Appendix J), implementation of the BCSP land use changes is projected to increase the MDD of water by approximately 39.52 gpm, average day demand (ADD) by 24.86 gpm, and peak hour demand by 74.57 gpm, which equate to an approximate 4.2 percent increase across these three demands compared to existing conditions. Table 4.15-2, Water Supply Analysis, summarizes the existing MDD and incremental MDD increase associated with BCSP land uses.

Table 4.15-2. Water Supply Analysis

City Imported Capacity (gpm)	Capacity with largest single source out of service (gpm)	Existing MDD (gpm)	With BCSP MDD (gpm)
23,697	15,708	8,615	8,655

Source: Appendix J.

Notes: gpm = gallons per minute; MDD = maximum day demand

As shown, there is sufficient supply available to meet the projected higher demand. In addition, the Water System Utility Impact Study for the BCSP calculated the City's water storage requirements using the pressure zone and took into account operational needs (supply and demand equalization), fire flow, and emergency storage. As shown in Table 4.15-3, Water Storage Analysis (Zone 750), existing storage requirements for the BCSP area is 16.48 mg, which increases slightly to 16.59 mg with future demand from implementation of the BCSP. As shown, the system has sufficient storage capacity to accommodate the BCSP land uses.

Table 4.15-3. Water Storage Analysis (Zone 750)

Land Use Scenario	Storage Volume Available (MG)	ADD (mgd)[2]	MDD (mgd)[2]	Fire Storage[1]	Operational (30% of MDD) (mg)	Emergency (2 x ADD) (mg)	Required Storage Total (mg)	Surplus Capacity (mg)
Existing	25.00	6.27	9.96	0.96	2.99	12.53	16.48	8.52
With BCSP		6.31	10.02	0.96	3.00	12.62	16.58	8.42

Source: Appendix J.

Notes: ADD = average daily demand; MDD = maximum daily demand; mg = million gallons; mgd = million gallons per day

[1] Fire storage requirement was calculated as 4,000 gallons per minute for 4 hours based on the highest fire flow requirement.

[2] The incremental BCSP in units of mgd is 0.036 mgd and 0.057 mgd.

Therefore, the City's existing water supply and storage capacity are sufficient to accommodate this increased water demand.

The water system must also be capable of providing adequate pressure for fire-fighting purposes. Land use changes from existing commercial or business uses to mixed-use development would require higher fire flow rates, from minimum fire flow of 2,500 gpm for Business/Commercial to 4,000 gpm

for Mixed Use. As future development applications are submitted, hydrant flow testing should be performed to confirm that local system conditions can meet the increased fire flow requirements.

To assess the contribution of individual development projects to the required Berry Street Booster Pump Station upgrades or to potential localized fire flow deficiencies, updated hydraulic modeling will need to be conducted once detailed development plans are available. Therefore, a mitigation measure is required to ensure that an updated hydraulic modeling is performed. This modeling would identify the necessary improvements and associated costs. Based on this information, the City would determine appropriate developer impact fees or cost-share requirements for new development or redevelopment within the BCSP area. No changes to the existing water systems are required as part of the BCSP at this time.

Wastewater

The Sanitary System Utility Impact Study for the BCSP (refer to Appendix K) evaluated the incremental change in sewage flow rates between the existing condition and the BCSP land uses by estimating land use type, acreage, and sewer generation factors. Based on the analysis, the incremental changes resulting from the allowable BCSP land uses compared to existing land use is 0.0753 MGD under ADWF and 0.1363 under PDWF. This results in a 4.6 percent ADWF increase and a 4.1 percent PDWF increase within the BCSP area.

The sewer flow in the BCSP area ultimately discharges to two different trunk interceptors: the OCSD Fullerton–Brea Trunk Sewer/Interceptor (Fullerton and Brea sewersheds) and the OCSD Rolling Hills Sub-Trunk/Santa Ana River Interceptor (Rolling Hills and Associated sewersheds).

The sewer increase under PDWF condition from the allowable BCSP land uses corresponds to approximately a 3.8 percent increase in flows to the OCSD Fullerton–Brea Trunk Sewer/Interceptor and a 4.2 percent increase in flows to the OCSD Rolling Hills Sub-Trunk/Santa Ana River Interceptor. At the already deficient Randolph Avenue/Imperial Highway segment, the incremental PDWF increase is estimated at 0.0178 mgd, representing approximately a 5.5 percent increase over existing modeled PDWF in the SMP. Sewer flow generated for existing land use and BCSP land uses is summarized in Table 5, Sewer Flow Incremental Changes Within the BCSP Area, of the Sanitary System Utility Impact Study (refer to Appendix K).

It should be noted that the sewer generation factors used in the 2021 SMP are based on 2019 billing records and 2020 flow-monitoring data collected during the COVID-19 Stay-at-Home period, which may have affected flow characteristics. Therefore, the baseline provides a conservative estimate, providing a suitably protective foundation for long-range capacity planning.

The City has established development review procedures to evaluate project-specific sewer system impacts that would be applicable to the BCSP. During the development application process, applicants coordinate with the City's Public Works/Engineering Department, which reviews

proposed flows against SMP assumptions to determine incremental changes in sewer loading and associated system impacts. If a deficiency is identified, the City requires sewer improvements to be addressed before construction permits are issued. Required improvements may include:

- construction of on-site or off-site sewer upgrades funded by the developer;
- participation in a reimbursement or cost-share agreement if improvements benefit multiple properties; or
- payment of impact and/or connection fees to fund programmed capital improvements.

No changes to the existing wastewater systems are proposed as part of the BCSP. Future infrastructure upgrades would be subject to City and State requirements and require CEQA review to identify any adverse physical effects on the environment. Therefore, impacts would be less than significant.

Storm Drains

As described previously, the drainage system within the BCSP area consists of a network of City-owned pipes, manholes, and catch basins that drain into the OCFCD facilities of Brea Creek and Fullerton Creek or connect to the City of Fullerton drainage system. The Drainage System Study for the BCSP (refer to Appendix L) assessed peak runoff rates to the City's storm drainage system under the proposed BCSP land uses and compared the results with peak runoff rates under existing land uses. Overall, the Drainage System Study found that proposed land uses within the BCSP are anticipated to generate lower peak stormwater runoff rates compared to the existing condition. Many of the proposed changes would allow industrial or commercial areas to be converted into mixed-use developments and these transitions are expected to reduce overall imperviousness, subsequently reducing peak runoff rates.

Within the BCSP drainage area, certain storm drain segments were identified as operating under pressured conditions during a modeled 10-year storm event; however, these segments were not flooding. Given the anticipated reduction in peak runoff rates associated with the proposed BCSP land uses, these pressurized segments are not expected to experience increased flooding risk.

Although the 2013 MPD recommends improvements for the existing ponding areas along Lambert Road as shown on Figures 4.15-5 and 4.9-6, the BCSP implementation would not adversely impact the existing drainage system. These locations are upstream of the BCSP area, and the BCSP would likely to result in less runoff to these drainage facilities. Each future development application within the BCSP area will be reviewed for consistency with the 2013 MPD, existing impervious coverage, drainage patterns, and field conditions as part of the development application review process, since modifications to on-site drainage systems on larger parcels could alter localized drainage patterns. No changes to the existing public drainage systems are proposed as part of the BCSP. Future infrastructure upgrades would be subject to City and State requirements and require CEQA review to identify any adverse physical effects on the environment. Therefore, impacts would be less than significant.

Electricity/Natural Gas

Implementation of future development may require, or result in, the relocation or construction of new or expanded electric power or natural gas facilities to meet future demands, which could cause significant environmental effects. Although demand for these services would increase compared to existing conditions, new development must comply with applicable provisions of the BCC (Title 13, Utilities); California Building Energy Efficiency Standards; appliance efficiency regulations set forth in Title 20 of the California Administrative Code; and CALGreen requirements. SCE, SoCalGas, and various franchised telecommunications providers are established utility providers with the capacity and operational mechanisms to serve anticipated growth within the Proposed Project area. Although the locations of specific utility infrastructure improvement projects are unknown at this time, future infrastructure upgrades would be subject to City and State requirements and require CEQA review to identify any adverse physical effects on the environment. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measure MM UTL-1 is required.

Level of Significance After Mitigation: Less than significant.

4.15.4.2 Threshold UTL-b: Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

Impact Analysis

Focused General Plan Update

As discussed above, the City's public water system receives imported water from the CDWC and the Metropolitan Water District of Orange County. A WSA (refer to Appendix M) was prepared to assess if sufficient water supplies are, or would be, available to meet the projected water demands of both the Focused GPU and the BCSP.

As shown in Table 4.15-4, Water Demand at Full Build-Out, the projected water demand for both the Focused GPU and the BCSP at full buildout would be 10,033 AFY in an Average Year and 10,636 AFY in dry years.

Table 4.15-4. Water Demand at Full Build-Out

Demand Description	Average Year (AFY)	Single Dry and Multiple Dry Years (AFY)
Brea Core Specific Plan		
Average Demand	8,995	9,535
Brea Core Specific Plan (BCSP) – New Demand	84	89
Total Demand with Brea Core Specific Plan	9,079	9,624
Brea Focused General Plan Update		
Average Demand	8,995	9,535
Brea Focused General Plan Update (includes BCSP) – New Demand	1,038	1,101
Total Demand with Brea Focused General Plan Update	10,033	10,636

Source: Appendix M.

Notes: AFY = acre-feet per year

Table 4.15-5, Water Supply at Full Build-Out, identifies the sources of water supply for the Proposed Project. The 2020 UWMP assumed a maximum supply of 9,000 AFY from the Main San Gabriel Basin and 115 AFY from the La Habra Basin. All remaining water was assumed to come from MWD, based on MWD's 2020 UWMP stating availability to serve additional water demands.

Table 4.15-5. Water Supply at Full Build-Out

Description	Average Year	Single and Multiple Dry Years
Brea Core Specific Plan		
Main San Gabriel Basin (CDWC)	8,961	9,000
La Habra Basin	115	89
MWD	0	535
Total Water Supply for Brea Core Specific Plan	9,079	9,624
Focused General Plan Update		
Main San Gabriel Basin (CDWC)	9,000	9,000
La Habra Basin	115	115
MWD	918	1,521
Total Water Supply for Brea Focused General Plan Update	10,033	10,636

Source: Appendix M.

Notes: AFY= acre-feet per year; CDWC = California Domestic Water Company

Table 4.15-6, Demand and Supply in Normal, Single Dry, and Multiple Dry Years, compares the existing supply with demand associated with the implementation of the Proposed Project within the 20-year planning horizon. As shown, there is sufficient supply in normal, single dry, and multiple dry years to meet projected water demand.

Table 4.15-6. Demand and Supply in Normal, Single Dry, and Multiple Dry Years

Description	2025	2030	2035	2040	2045
Normal Year					
Supply	8,995	10,033	10,033	10,033	10,033
Demand totals	8,995	10,033	10,033	10,033	10,033
Difference	0	0	0	0	0
Single Dry Year					
Supply totals	n/a	10,636	10,636	10,636	10,636
Demand totals	n/a	10,636	10,636	10,636	10,636
Difference	0	0	0	0	0
Second Dry Year					
Supply totals	n/a	10,636	10,636	10,636	10,636
Demand totals	n/a	10,636	10,636	10,636	10,636
Difference	0	0	0	0	0
Third Dry Year					
Supply totals	n/a	10,636	10,636	10,636	10,636
Demand totals	n/a	10,636	10,636	10,636	10,636
Difference	0	0	0	0	0
Fourth Dry Year					
Supply totals	n/a	10,636	10,636	10,636	10,636
Demand totals	n/a	10,636	10,636	10,636	10,636
Difference	0	0	0	0	0

Source: Appendix M.

Therefore, there is sufficient water supply planned to serve the Proposed Project in normal, single dry, and multiple dry water year forecasts. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The analysis above for the Focused GPU applies to the BCSP. There is sufficient water supply planned to serve the BCSP future water demand in normal, single dry, and multiple dry water year forecasts. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.4.3 Threshold UTL-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.

Impact Analysis

Focused General Plan Update

New development constructed pursuant to the Focused GPU would increase wastewater generation. OCSD's strategic planning uses maximum population densities and very conservative flow factors, which are appropriate for regional level planning. Therefore, it is assumed that any project-generated flows are accounted for in OCSD's projections and planning. In addition, OCSD provides ongoing analysis of the sewer system within its jurisdiction, ensuring the long-term functionality of OCSD facilities. Therefore, there is adequate capacity to serve the Proposed Project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Implementation of the BCSP would generate an increase in wastewater. The Sanitary System Utility Impact Study for the BCSP (refer to Appendix K) evaluated the incremental change in sewage flow rates between the existing condition and the BCSP land uses by estimating land use type, acreage, and sewer generation factors. Based on the analysis, at full buildout, land uses within the BCSP are projected to increase the City's overall ADWF 0.3238 mgd or by approximately 23.6 percent. This increase corresponds to approximately a 3.9 percent increase in flows to the OCSD Fullerton–Brea Trunk Sewer/Interceptor and a 15.3 percent increase in flows to the OCSD Rolling Hills Sub-Trunk/Santa Ana River Interceptor.

OCSD's strategic planning uses maximum population densities and very conservative flow factors, which are appropriate for regional level planning. Therefore, it is assumed that any project-generated flows are accounted for in OCSD's projections and planning. In addition, OCSD provides ongoing analysis of the sewer system within its jurisdiction, ensuring the long-term functionality of OCSD facilities. Therefore, there is adequate capacity to serve the Proposed Project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.4.4 Threshold UTL-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.

Impact Analysis

Focused General Plan Update

Implementation of the Focused GPU would result in an increase of development and related solid waste generation. As discussed in Section 4.15.1.2, the baseline solid waste disposal for the City is estimated to be 817,733 lbs/day. Table 4.15-7, Solid Waste Generation – Project Conditions, shows the estimated solid waste generation rates under full buildout of the Focused GPU. As shown, the projected solid waste generation is 1,173,254 lbs/day or a net increase of 355,521 lbs/day. This assumes that the current diversion rate for the City remains the same. It is likely that with the expansion of organics and recycling programs, the diversion rate would increase in the future, resulting in a decrease in solid waste landfill disposal.

Table 4.15-7. Solid Waste Generation – Project Conditions

Total Population	Solid Waste Generation Rate (lbs/resident/day)	Solid Waste Generation (lbs/day)	Total Jobs	Solid Waste Generation Rate (lbs/employee/day)	Solid Waste Generation (lbs/day)	Total Solid Waste Generation (lbs/day)
67,647	8.3	561,470	73,709	8.3	611,784	1,173,254
Total Solid Waste Generation (1,173,254 lbs/day) - Existing Solid Waste Generation (817,733 lbs/day) = 355,521 lbs/day						

Source: Cal Recycle 2025b.
Notes: lbs/day=pounds per day

Waste from future development within the Focused GPU would be transported to the Olinda Alpha Landfill, which has an average daily disposal rate of 7,000 tons per day, although it is permitted up to 8,000 tons per day. The landfill has the capacity to serve residents and businesses until 2036 and has an estimated remaining capacity of approximately 17.5 million cubic yards as of 2020 (CalRecycle 2025 a). Therefore, the Proposed Project is projected to generate approximately 355,521 lbs/day of solid waste at buildout or 17 percent of the landfill's remaining daily allowable intake. Therefore, solid waste facilities would be able to accommodate Proposed Project-generated solid waste. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Refer to analysis for Focused GPU. Project generation rates for the Focused GPU are inclusive of the generation rates for the BCSP. Solid waste facilities would be able to accommodate Proposed Project-generated solid waste. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.4.5 Threshold UTL-e: Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

Impact Analysis

Focused General Plan Update

Future development associated with the Focused GPU would generate solid waste during construction and operation. Future development pursuant to the Focused GPU would be required to comply with Section 4.408 of the 2022 California Green Building Code Standards, which requires that at least 65 percent of nonhazardous construction and demolition waste from non-residential construction operations be recycled or salvaged for reuse. The California Building Code and BCC also require a construction and demolition materials management plan prior to issuance of building permits for large projects.

Future development would be required to comply with the requirements of AB 341 that mandates recycling for commercial and multi-family residential land uses as well as schools and school districts. Additionally, businesses pursuant to the Focused GPU that generate organic waste in amounts over a certain threshold would be mandated to recycle organic matter in accordance with AB 1826. Therefore, the Proposed Project would comply with all applicable Federal, State, and local statutes and regulations related to solid waste disposal. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

Refer to analysis for Focused GPU. Future development pursuant to the BCSP would be required to comply with all applicable Federal, State, and local statutes and regulations related to solid waste disposal. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to utilities and service systems that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general

plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.15.5.1 Cumulative Threshold UTL-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.

Focused General Plan Update and Brea Core Specific Plan

The geographic context for cumulative impacts to new or expanded utility facilities is the service areas of the City, OCWD, MWD, OCSD, OCFCD, SCE, and SoCalGas. A significant cumulative impact would result if combined cumulative projects would require the need for new or expanded utilities facilities that result in significant environmental effects. To support growth, new water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications facilities would be constructed in the City. Pending and future projects would be required to analyze public utilities demand and supply to avoid conflicts and provide upgrades or pay development impact fees toward new infrastructure facilities, as needed. The majority of these new facilities would connect to existing systems. These new facilities could result in new significant physical impacts on the environment, mostly associated with construction activities and placement in sensitive resource areas. As discussed in Section 4.15.4.1, Threshold UTL-a, it is reasonable to expect that these projects, like the Proposed Project, would comply with CEQA, and any project-specific impacts identified from construction of these facilities would be mitigated to the extent feasible pursuant to the City's WMP, SMP, and MPD. Therefore, the Proposed Project would not contribute to a cumulative impact with implementation of Mitigation Measure UTL-1.

Level of Significance Before Mitigation: Potentially significant.

Mitigation Measures: Mitigation Measures MM UTL-1 is required.

Level of Significance After Mitigation: Less than significant.

4.15.5.2 Cumulative Threshold UTL-b: Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

Focused General Plan Update and Brea Core Specific Plan

The geographic context for cumulative impacts to water supply services is the City, OCWD, and MWD service area. Existing and future development within the service area would require

additional quantities of water. The City's 2021 UWMP projects that it will have water supplies available for all years up to 2045 during normal years, single dry years, and multiple dry years.

Future projects could result in increases in water demand. However, cumulative water demands are addressed through the WSA prepared for the Proposed Project, and expansion and upgrades to water infrastructure are addressed through the City's CIP. Projects that meet the SB 610 criteria, such as residential projects with more than 500 dwelling units, would be required to prepare WSAs. The City would review such projects for adequacy of water supply, and the City is required to update the UWMP every 5 years to ensure that there are adequate water supplies and contingency plans for future residents and customers. New construction projects and continuing conservation efforts would result in a reduction in per capita water use over time, which would ensure that cumulative impacts with respect to water supply would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.5.3 Cumulative Threshold UTL-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.

Focused General Plan Update and Brea Core Specific Plan

The geographic context for cumulative impacts for wastewater treatment capacity is the OCSD service area. Future projects could result in incrementally increase demands on OCSD's facilities, including treatment demands in the OCSD service area. However, OCSD's strategic planning uses maximum population densities and very conservative flow factors, as appropriate for regional level planning. It is assumed that any project-generated flows are accounted for in OCSD's projections and planning. Moreover, OCSD provides ongoing analysis of the sewer system within its jurisdiction, ensuring the long-term functionality of OCSD facilities. Therefore, development of the Proposed Project, along with other cumulative projects in the City's and OCSD's sewer service area would not result in individually significant impacts, and the Proposed Project would not contribute to a cumulative impact.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.5.4 Cumulative Threshold UTL-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.

Focused General Plan Update and Brea Core Specific Plan

The geographic context for cumulative impacts to solid waste generation is the Olinda Alpha Landfill service area. Implementation of the Proposed Project, as well as other regional development, would increase the amount of solid waste produced. However, extensive regulations and waste management programs are in place at the State and local levels that focus on increasing diversion and conversion of waste into the future. Most cumulative projects would undergo CEQA review similar to the Proposed Project. This process would include verifying that there is adequate capacity in the landfill system to accept trash and recycling for the cumulative projects. Therefore, in combination, cumulative projects would not result in a significant cumulative impact related to solid waste generation. Therefore, the Proposed Project would not cumulatively affect long-term solid waste collection infrastructure in excess of the existing capacity.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.5.5 Cumulative Threshold UTL-e: Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

Focused General Plan Update and Brea Core Specific Plan

The geographic context for cumulative impacts to compliance with solid waste regulations is the City. Cumulative projects would be required to comply with Federal, State, and local regulations pertaining to solid waste disposal. Therefore, the Proposed Project, in combination with other cumulative projects, would not result in a significant impact associated with solid waste compliance. The Proposed Project's contribution would not be cumulatively considerable.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.15.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds UTL-a (storm drain, electricity, natural gas, and telecommunication facilities) through UTL-e would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP UTL-1 and PPP UTL-2 and applicable Focused GPU goals, policies, and actions (refer to Appendix C).

Without mitigation, environmental impacts related to Threshold UTL-a (water and wastewater systems) would be potentially significant.

4.15.7 Mitigation Measures

MM UTL-1 **Water and Sewer Infrastructure Improvements.** Prior to approval of any discretionary development permit or issuance of building permits, the project proponent shall demonstrate compliance with the City of Brea's Water Master Plan, and Sewer Master Plan, as well as all applicable improvement and design requirements of the City of Brea Public Works Department and the City's Capital Improvement Program (CIP).

As part of the development application review process, the applicant shall retain a qualified licensed civil engineer to evaluate existing water and sewer system conditions serving the project site. If the evaluation identifies any capacity deficiencies or facility constraints, the applicant shall prepare and submit the appropriate system testing and modeling (e.g., water flow testing, water hydraulic modeling, sewer capacity modeling and capacity analysis) to the Public Works Department for review and approval. The modeling shall identify the specific infrastructure upgrades, improvements, and associated costs required to ensure adequate service capacity and compliance with City design standards.

The applicant shall construct, or fund the construction of, all improvements identified through the approved modeling and required by the Public Works Department prior to occupancy or in accordance with a timing and phasing plan approved by the City. No development shall be permitted to proceed unless all required improvements or fair-share contributions are secured through conditions of approval, improvement plans, or a development agreement.

4.15.8 Level of Significance After Mitigation

Threshold UTL-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.

Implementation of Mitigation Measure MM UTL-1 would reduce potential adverse impacts on water and sewer systems to a less than significant level by requiring site-specific evaluations and the implementation of recommended improvements or payment of the fair-share cost of such improvements. Impacts to water and wastewater systems would be less than significant, and no significant and unavoidable impacts would remain.

4.16 Wildfire

This section evaluates the potential for impacts on wildfire resulting from implementation of the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project).

This analysis addresses potential impacts to implementation of an emergency response or evacuation plan, exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure, and exposure of people or structures to significant post-wildfire risks, such as flooding or landslides.

4.16.1 Environmental Setting

The following sections describe the environmental setting for the Project as it relates to wildfire.

4.16.1.1 Regulatory Setting

This section describes the Federal, State, and local regulatory framework adopted to address wildfire.

Federal

Stafford Disaster Relief and Emergency Assistance Act

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) is a Federal law designed to bring an orderly and systemic means of Federal natural disaster assistance for State and local governments in carrying out their responsibilities to aid citizens. The Stafford Act is a 1988 amended version of the Disaster Relief Act of 1974. It created the system in place today by which a presidential disaster declaration or an emergency declaration triggers financial and physical assistance through the Federal Emergency Management Agency.

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a State-level mitigation plan as a condition of disaster assistance. There are two different levels of State disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. The intent is to establish plans for active response to severe wildfires and their impacts to communities while ensuring sufficient firefighting capacity. The National Fire Plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

International Building Code and International Fire Code

The International Building Code and International Fire Code are model codes developed by the International Code Council to regulate fire safety in buildings. The International Building Code focuses on building design and construction, while the International Fire Code addresses fire prevention, fire protection, and life safety in both new and existing buildings. Both codes work together to safeguard life and property from fire and explosion hazards.

International Wildland-Urban Interface Code

The International Wildland-Urban Interface Code (IWUIC) establishes requirements for land use and the built environment within designated Wildland Urban Interface (WUI) areas using prescriptive and performance provisions. The IWUIC establishes minimum special regulations for the safeguarding of life and property from the intrusion of wildfire and:

- Regulates ignition-resistant construction techniques and defensible space as well as fire department access and available water supplies for fire suppression.
- Focuses on preventing ignition of buildings and vegetative fuels from direct exposure to wildfire and fire exposure from adjacent structures.
- Helps prevent structure fires in the WUI from spreading to wildland fuels, even in the absence of fire department intervention.

State

California Department of Forestry and Fire Protection

California Department of Forestry and Fire Protection (CAL FIRE) serves and safeguards the people, and protects the property and resources of over 31 million acres of California's privately owned wildlands within the State Responsibility Area (SRA). CAL FIRE's mission emphasizes the management and protection of California's natural resources; a goal that is accomplished through ongoing assessment and study of the State's natural resources and Fire and Resource Assessment Program. CAL FIRE foresters and fire personnel work closely with other agencies to encourage and implement fuel management projects to reduce the threat of uncontrolled wildfires. CAL FIRE provides varied emergency services to 36 counties via contracts with local governments. CAL FIRE's Fire Prevention Program consists of multiple activities, including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement. Typical CAL FIRE prevention projects include brush clearance, prescribed fires, defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, and fire-related law enforcement activities.

Office of Emergency Services

The California Governor's Office of Emergency Services is responsible for coordinating overall State agency response to disasters; ensuring the State's readiness to respond to and recover from

all hazards; and assisting local governments in their emergency preparedness, response, recovery, and mitigation.

California Fire Code

The California Fire Code (CFC) is Part 9 of thirteen parts of the official building regulations to the California Code of Regulations (CCR). This code is also referred to as CCR Title 24, or the California Building Standards Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC applies to the construction—including the presence of fire service features and fire apparatus access roads—alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, means of egress, evacuation plans, location, maintenance, and demolition and removal of every building or structure or any appurtenances connected or attached to such building structures throughout the State. In the City of Brea (City), the CFC is administered by the Brea Fire Department, under the authority of the Fire Chief of Brea.

In addition, CCR Title 14 establishes the State Minimum Fire Safe Regulations, which constitute the minimum wildfire protection standards of the California Board of Forestry and Fire Protection.

2024 California Fire Plan

The California Strategic Fire Plan for California is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. The plan serves as the State's road map for reducing the risk of wildfire by emphasizing preventive action before a fire starts. The California Fire Plan reduces firefighting costs and property losses, increases firefighter safety, and contributes to ecosystem health. Goals outlined by the California Fire Plan include:

1. Attract, hire, and retain quality employees.
2. Ensure all employees understand how the Department's various programs and job duties contribute towards efficiently achieving the CAL FIRE mission.
3. Promote a culture that values aquitable access, embraces diverse backgrounds and experiences, and actively removes barriers to cultivate a more inclusive environment.
4. Leverage technology to modernize internal human resources processes and create efficient and effective innovative solutions to promote, support, and enhance the employee experience.
5. Strengthen the Department's physical and digital infrastructure and streamline equitable access to onformation across core services.
6. Identify core capabilities and strengthen operational capacity.

California Building Code

Building standards for high fire hazard areas are identified in the California Building Code (CBC), which is administered by the City's Building and Safety Division. Chapters 6–9 of the CBC establish standard building fire prevention systems, fire and smoke protection features, interior finishes, and fire protection and life safety systems. The current 2022 CBC became effective on January 1, 2023, and the 2025 edition will become effective January 1, 2026.

California Health and Safety Code, Section 13000 et seq.

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

California State Multi-Hazard Mitigation Plan

The purpose of the California State Hazard Mitigation Plan is to significantly reduce deaths, injuries, and other losses attributed to natural- and human-caused hazards in California. The California State Hazard Mitigation Plan guides hazard mitigation activities, emphasizing partnerships among local, State, and Federal agencies, as well as the private sector (City of Brea 2024).

California Wildland-Urban Interface Code

The California Wildland-Urban Interface Code (CWUIC) is a new, consolidated set of wildfire safety regulations adopted into Title 24, Part 7 of the California Building Standards Code. It became effective January 1, 2026, and is based on the 2024 IWUIC with California-specific amendments. The CWUIC is organized into the following chapters with distinct purposes:

- Chapter 1: Scope and Administration
- Chapter 2: Definitions
- Chapter 3: Wildland-Urban Interface Areas
- Chapter 4: WUI Area Requirements
- Chapter 5: Special Building Construction Regulations
- Chapter 6: Fire Protection Requirements
- Chapter 7: Referenced Standards

Governor's Office of Land Use and Climate Innovation Fire Hazard Planning Technical Advisory

The Governor's Office of Land Use and Climate Innovation's (formerly the Governor's Office of Planning and Research, or OPR) technical advisory provides context relating to wildfire risk and

environmental and regulatory settings, as well as general planning guidance. Guidance topics include outreach and engagement, fire hazard and risk assessment, policy development, and example policies (OPR 2022). The goal of the technical advisory is to provide a robust planning framework for addressing fire hazards, reducing risk, and increasing resilience across California's diverse communities and landscapes. To accomplish this goal, local agencies (i.e., cities and counties) must develop and incorporate effective policies and implementation programs in their general plans and integrate their general plans with other relevant hazard and risk reduction policies, plans, and programs. This technical advisory guides those policies and programs and is also intended to assist city and county planners in discussions with professionals from fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery agencies.

California Government Code, Sections 51175–51189 and 66474.02

Government Code, Sections 51175–51189, designates responsibility to local agencies to identify areas in the State as Very High Fire Hazard Severity Zones (FHSZs) falling under local protection with the Local Responsibility Area (LRA). Classification of Very High FHSZ must be consistent with Statewide criteria. Designation of Very High FHSZ is based on fuel loading, slope, weather, and other relevant factors, including winds identified as causing wildfire spread. Once identified, information on Very High FHSZ is mapped and made available to the public. The CAL FIRE director periodically reviews the LRA, and as necessary, makes recommendations relative to the designated Very High FHSZ. This section also outlines brush clearance and defensible space maintenance for buildings in the FHSZ, as well as the necessary permit process for building construction and reconstruction. CAL FIRE guides fuel management and defensible space requirements.

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7, Division 2, of the Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels designated within Very High FHSZs or that lie in the SRA unless certain findings are made before approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in the California Public Resource Code (PRC), Sections 4290 and 4291; (2) structural fire protection services will be available for the subdivision through a publicly funded entity; and (3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

California Public Resource Code

PRC Section 4119 authorizes the U.S. Forest Service, the U.S. Department of the Interior, Bureau of Land Management, and CAL FIRE to inspect properties to determine if they comply with State forest and fire laws, regulations, or use permits.

PRC Sections 4201–4204 direct CAL FIRE to map areas of significant fire hazards within SRAs. Classification is based on fuels, terrain, weather, and other relevant factors, and falls under either Moderate, High, or Very High. The director of CAL FIRE is required to designate, review, and revise, as necessary, FHSZs and assign to each zone a rating reflecting the degree of fire hazard severity expected to prevail in the zone.

PRC Section 4290 requires the adoption of minimum fire safety standards related to defensible space that apply to SRA lands under the authority of CAL FIRE and to lands classified and designated as Very High FHSZ. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within SRAs approved after January 1, 1991, and within lands classified and designated as Very High FHSZ after July 1, 2021. The regulations shall include all of the following:

1. Road standards for fire equipment access.
2. Standards for signs identifying streets, roads, and buildings.
3. Minimum private water supply reserves for emergency fire use.
4. Fuel breaks and greenbelts.

PRC Section 4290.5 requires the California Board of Forestry and Fire Protection, in consultation with the State Fire Marshal, to identify existing subdivisions with more than 30 dwelling units located in the SRA or a Very High FHSZ, identified pursuant to Section 51178 of the Government Code, without a secondary means of egress route that are at significant fire risk. Additionally, the Board, in consultation with the State Fire Marshal and the local government that identified the subdivisions, shall develop recommendations to improve the subdivision's fire safety.

PRC Section 4291 requires a person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material to maintain defensible space of 100 feet (or up to the property line, whichever is less) from each side and the front and rear of the structure. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. Here, "fuel" means any combustible material, including petroleum-based products and wildland fuels. The intensity of fuel management may vary within the 100-foot perimeter of the structure, the most intense being within the first 30 feet around the structure. A greater distance may be required by State law or local ordinances, program standards, rules, or regulations. Clearance beyond the property line may only be required if the State law or local ordinances, program standards, rules, or regulations include findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on the adjacent property shall only be conducted following written consent by the adjacent landowner. This section does not apply to single specimens of trees or other vegetation that are well-pruned and maintained to

effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation.

PRC Section 4427 limits the use of any motor, engine, boiler, stationary equipment, welding equipment, cutting torches, tar pots, or grinding devices from which a spark, fire, or flame may originate when the equipment is located on or near land covered by forest, brush, or grass. Before such equipment may be used, all flammable material, including snags, must be cleared away from the area around such operation for a distance of 10 feet. A serviceable round point shovel with an overall length of not less than 46 inches and a backpack pump water-type fire extinguisher, fully equipped and ready for use, must be maintained in the immediate area during the operation.

Under PRC Section 4741, per policies established by the State Board of Forestry and Fire Protection, CAL FIRE shall assist local governments in preventing future wildland fire and vegetation management problems by making its wildland fire prevention and vegetation management expertise available to local governments to the extent possible within the department's budgetary limitations. CAL FIRE recommendations shall be advisory in nature and local governments shall not be required to follow such recommendations.

Regional

County of Orange and Orange County Fire Authority Local Hazard Mitigation Plan

The mission of the County of Orange and Orange County Fire Authority (OCFA) Local Hazard Mitigation Plan is to promote sound public policy designed to protect residents, critical facilities, infrastructure, key resources, private property, and the environment from natural hazards in the County unincorporated area, fire hazards in the OCFA service area, and County- and OCFA-owned facilities. The OCFA provides fire suppression and prevention services to County unincorporated areas and other jurisdictions and contracts under its joint powers authority.

Orange County Fire Authority Fire Prevention Guidelines

- "Fire Master Plans for Commercial & Residential Development" (Guideline B-09): This guideline pertains to the creation and maintenance of fire department access roadways, access walkways to and around buildings, and hydrant quantity and placement as required by the 2016 CFC and CBC and as amended by local ordinance (OCFA 2017a).
- "Vegetation Management Guideline Technical Design for New Construction Fuel Modification Plans and Maintenance Program" (Guideline C-05): Fuel modification plans require that landscaped areas adjacent to new buildings be dedicated for permanent vegetation management activities. This guideline covers the timing of plans for construction, plan criteria needed for approval, the resource agency plant list for the zones, new construction inspection requirements, and introductory maintenance information (OCFA 2017b).

Local

Brea Fire Department/Emergency Services

Brea Fire Department provides 24-hour emergency response to a wide variety of critical situations, including fires and hazardous materials incidents.

The City provides emergency preparedness services and operates an active Fire Prevention and Emergency Preparedness Program, which provides for fire inspections, hazardous process permitting, fire code enforcement, public education, and business emergency planning in accordance with the CCR (City of Brea 2019).

Brea Very High Fire Hazard Severity Zone Requirements Technical Design for New Construction Fuel Modification Plans and Maintenance Program

The purpose of this guideline, dated January 14, 2019, is to provide information on how fuel modification zones in the City are to be designed, installed, and maintained to meet safety requirements. Vegetation management practices are implemented and enforced through fuel modification and defensible space. Prior to beginning the grading and/or construction process, developers and builders are required to receive approval from Brea Fire for the design of a fuel modification plan and for the installation of fuel modification zones. Separately, the CFC and PRC require land owners to implement and annually maintain vegetation reduction activity and a defensible space of up to 100 feet between their structure and the wildfire area, measured from their structure to their property line. Defensible space is required for land owners in Brea when a fuel modification plan and installation were not previously approved. This guideline addresses only the fuel modification design and maintenance process requirements.

Emergency Response Planning

The City has an active emergency preparedness program coordinated by a professional emergency manager. Public programs available range from those provided upon the request of an organization or group, to the more structured Brea Community Emergency Response Team classes, offered periodically. The five key elements of the City's Emergency Preparedness Program are:

- Development and maintenance of the City's Emergency Response Plan.
- Development and maintenance of the City's Emergency Operations Center.
- Coordination of preparedness, training, and exercises for City staff to be sure they are ready to respond to any emergency.
- Public education and outreach to the residents and businesses of Brea.
- Funding recovery following disasters (City of Brea 2019).

2003 Brea General Plan

While the Focused GPU will replace or reorganize these policies, they remain applicable until adoption of the Brea 2050 General Plan.

The 2003 Brea General Plan, Chapter 6, Public Safety Element, includes goals and policies aimed at ensuring public safety by protecting the community from hazards associated with wildland fires. Applicable policies include:

- **Policy PS-1.5.** Maintain a maximum 4- to 6-minute emergency response time for fire safety services. Maintain a 3- to 5-minute response time from emergency police response services. Require that all new development be able to meet established standards for such response.
- **Policy PS-1.6.** Impose special conditions as needed on development projects to ensure that adequate fire protection measures are in place and maintained.
- **Policy PS-6.1.** Encourage residents to plant and maintain fire retardant slope cover to reduce the risk of brush fire in areas adjacent to the canyons and develop and implement stringent site design and maintenance standards for areas with high fire potential. To the extent possible, native, noninvasive plant material are encouraged.
- **Policy PS-6.2.** Assure provision of adequate fire equipment access and fire suppression resources to all developed and open space areas.

Brea City Code (BCC) The 2019 CBC is adopted with certain modifications as Chapter 15.08, Building Code, of the BCC. The 2019 CFC is adopted with certain modifications as BCC Chapter 16.04, Brea Fire Code.

4.16.1.2 Existing Conditions

A wildfire is an unplanned ignition in the wildland. Wildfires burn in many types of vegetation—forest, woodland, scrub (including chaparral, sage scrub, and desert scrub), and grassland. Many species of native California plants are adapted to fire, which has always been a natural component of the Earth's ecosystems. However, there is an important distinction between low-intensity natural wildfires that are set or controlled for a particular purpose by a land manager, and wildfires that burn out of control and are made unpredictable by changes in weather (DGS 1999).

Wildfire Behavior and Contributing Factors

Wildfire behavior is a product of several variables—primarily climate, vegetation, topography, and human influences—that intermix to produce local and regional fire regimes that affect how, when, and where fires burn. The fire regime in any area is defined by several factors, including fire frequency, intensity, and severity and area burned. An understanding of each of these factors is important for determining how the variables that affect fire behavior produce fire risk. "Fire frequency" refers to the number of fires that occur in a given area over a given period, "fire

intensity" refers to the speed at which fire travels and the heat that it produces, "fire severity" refers to the extent to which ecosystems and existing conditions are affected or changed by a fire, and "area burned" refers to the size of the area burned by wildfire (USDA 2023). Human influence on wildfire is broad and can be substantial. It includes direct influences, such as the ignition and suppression of fires, and indirect influences, such as alterations in land use patterns that support modified vegetative regimes and increased development in the WUI.

Wildfires are a significant threat in California, particularly in recent years as the landscape responds to climate change and decades of fire suppression. As climate change persists, it is anticipated to produce increasing temperatures and drier conditions that would generate abundant dry fuels. All wildfires (those initiated by both natural and human-made sources) tend to be larger under drier atmospheric conditions and when fed by drier fuel sources (Balch et al. 2017). In addition, climate change has led to exacerbation of wildfire conditions during a longer period of the year as the spring season warms, driving earlier spring snowmelt and as winter precipitation decreases overall (Westerling et al. 2006). Further, wildfire activity is closely related to temperature and drought conditions, and in recent decades, increasing drought frequency and warming temperatures have led to an increase in wildfire activity (Westerling et al. 2006; Schoennagel et al. 2017). In particular, the western United States, including California, has seen increases in wildfire activity in terms of area burned, the number of large fires, and fire season length (Westerling et al. 2006; Abatzoglou and Williams 2016). Orange County experiences destructive wildland fires almost every year, particularly in the fall. Wildland fires in the County range from small, localized fires to fires covering thousands of acres (Orange County and OCFA 2021). Table 4.16-1, Federal Disaster Declarations Related to Fire in Orange County, shows Federal disaster declarations for fires, including wildfires, in Orange County.

Table 4.16-1. Federal Disaster Declarations Related to Fire in Orange County

Disaster Number	Year	Incident Name or Type
FM-5538	2024	Airport Fire
FM-5439	2022	Coastal Fire
FM-5383	2021	Bond Fire
FM-5381	2021	Blue Ridge Fire
FM-5380	2021	Silverado Fire
FM-5268	2018	Wildfires (Holy Fire)
DR-4344	2018	Canyon 2 Fire
FM-5213	2017	Canyon Fire
FM-2792	2008	Freeway Complex Fire
DR-1810	2008	Wildfires
FM-2737	2007	Santiago Fire
FM-2683	2007	241 Fire
EM-3279	2007	Wildfires

Table 4.16-1. Federal Disaster Declarations Related to Fire in Orange County

Disaster Number	Year	Incident Name or Type
DR01731	2007	Wildfires, Flooding, Mud Flows, and Debris Flows
FM-2737	2006	Sierra Fire
FS-2405	2002	Antonio Fire
EM-3120	1996	Severe Firestorms
DR-1005	1993	Fires, Mud/Landslide, Flooding, Soil Erosion
DR-657	1982	Urban Fire
DR-635	1980	Brush and Timber Fires

Source: Orange County and OCFA 2021.

Wildfire Effects

Debris Flows After Wildfires

Post-fire landslide hazards include fast-moving, highly destructive debris flows in the years following wildfires and after high-intensity rainfall events and flows that are generated over longer time periods and accompanied by root decay and loss of soil strength. Post-fire debris flows are particularly hazardous because they can happen with little warning, sweep away objects in their paths, strip vegetation, block drainage ways, damage structures, and endanger human life. Debris flows carry larger fragments than mudflows.

Fires increase the potential for debris flows in two ways:

- Fires bake soil into a hard crust that repels water.
- Fires destroy vegetation that would flow and absorb rainfall, and whose roots would help stabilize soil. (USGS 2019).

Post-fire debris flows are most common in the two years after a fire, usually triggered by heavy rainfall. It takes much less rainfall to trigger debris flows from burned basins than unburned. In Southern California, as little as 0.3 inches of rainfall in 30 minutes has triggered debris flows, and any storm that has intensities greater than about 0.4 inch per hour can produce debris flows (USGS 2018). The burning of vegetation and soil on slopes more than doubles the rate that water will run off into watercourses (CGS 2018).

The U.S. Geological Survey (USGS) conducts post-fire debris flow hazard assessments for selected fires in the western U.S. The Canyon 2 Fire that burned 9,143 acers in the Anaheim Hills area was the only wildfire in Orange County with a debris flow hazard for the years 2017 and 2018 (USGS 2019). In 2018/2019, the Holy Fire generated several significant debris flows in area of Trabuco Creek, and in 2020/21, the Bond Fire created debris impacts in the Silverado, Williams, and Modjeska Canyon areas (Orange County and OCFA 2021).

Air Pollution from Wildfire

Smoke is made up of a complex mixture of gases and fine particles produced when wood and other organic materials burn. The biggest health threat from smoke is from fine particles that can penetrate deep into the lungs, causing a range of health problems, from burning eyes and a runny nose to aggravated chronic heart and lung diseases. Exposure to particle pollution is also linked to premature death. Some populations are more sensitive than others to smoke—for instance, people with heart or lung diseases, older adults, children, people with diabetes, and pregnant women (Airnow 2017).

Wildfire Protection Responsibility Areas

Wildland fire protection in California is the responsibility of either the local, State, or Federal government. SRAs are where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRAs form one large area over 31 million acres, and CAL FIRE provides a basic level of wildland fire prevention and protection services.

LRAs include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government (CAL FIRE 2025). CAL FIRE uses an extension of the SRA model for FHSZs as the basis for evaluating fire hazard in LRAs. The LRA hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area.

Fire Hazard Severity Zones

CAL FIRE is mandated by Public Resources Code, Sections 4201 to 4204, and California Government Code, Sections 51175 to 51189, to identify FHSZs for all communities in California (based on factors such as fuel/vegetation, slope/terrain, and fire weather) with varying degrees of fire hazard (i.e., Moderate, High, and Very High) which are mapped as part of its Fire and Resource Assessment Program. These are areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors. FHSZs identify areas where wildfire hazards could be more severe and therefore, are of greater concern. The FHSZ model inputs frequency of fire weather, ignition patterns, expected rate-of spread, and past fire history. It also accounts for flying ember production based on the area of influence where embers are likely to land and cause ignitions. Although FHSZ classifications do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and therefore are of greater concern.

Wildfire Potential

Figure 4.8-3, Fire Hazard Severity Zones, in Section 4.8, Hazards and Hazardous Materials, shows that the northernmost and easternmost portion of the City boundary where more hilly and mountainous regions of the City are designated as a Very High FHSZ. This includes neighborhoods of concern for evacuation like Blackstone, Olinda Village, and Heritage Hills. On

the southern edge of the Very High FHSZ boundary lies the High FHSZ and on the southern edge of the High FHSZ lies the Moderate FHSZ. Only the northeastern corner of BCSP area lies within the Moderate FHSZ. The City's Sphere of Influence contains a large portion of land in the Very High FHSZ.

Brea is not in an area susceptible to debris flow hazard.

Wildland-Urban Interface

The WUI is the zone of transition between unoccupied land and human development. It is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels (U.S. Fire Administration 2025). CAL FIRE's WUI designation dataset is derived from the 2015 Assessment of Forest and Rangelands, produced by the Fire and Resource Assessment Program. CAL FIRE advises that this layer is not suited for WUI designations for individual houses or neighborhoods, and a field review process is still required. WUI designations include Interface, Intermix, and Influence Zone, which are defined based on housing density classes, as described further below.

Housing Density Classes (DEN4) used in the WUI definitions:

- Class 1: Less than one house per 20 acres
- Class 2: One house per 20 acres to one house per 5 acres
- Class 3: More than one house per 5 acres to one house per acre
- Class 4: More than one house per acre

The Interface consists of dense housing adjacent to vegetation that can burn in a wildfire. Interface areas meet the following criteria:

1. DEN4 Class 2, 3, or 4;
2. In Moderate, High, or Very High FHSZ;
3. Not dominated by wildland vegetation;
4. Spatially contiguous groups of 30m cells that are 10 acres and larger.

The Intermix consists of housing development interspersed in an area dominated by wildland vegetation subject to wildfire. Intermix areas meet the following criteria:

1. Not Interface;
2. DEN4 Class 2;
3. DEN4 Class 3, 4 dominated by wildland vegetation;
4. In Moderate, High, or Very High FHSZ;
5. Improved Parcels only;
6. Spatially contiguous groups of 30m cells that are 10 acres and larger.

The Influence Zone consists of wildfire susceptible (i.e., wildland) vegetation up to 1.5 miles from Interface or Intermix.

Carbon Canyon, located in northern Orange County and adjacent to Los Angeles and San Bernardino counties, comprises approximately 1,758 acres and is part of the wildland/urban interface in Brea.

Firefighting Resources

The Brea Fire Department and OCFA currently provide fire protection and emergency medical services to the Project area. Brea Fire Department has four stations strategically located across the City. The Brea Fire Department is comprised of 50 sworn emergency response personnel that serve a residential population of more than 47,000 and a daytime population of 120,000 as people visit Brea to work and recreate. The Brea Fire Department command staff is comprised of three Battalion Chiefs, one Division Chief, a Deputy Chief, and a Fire Chief (City of Brea 2025).

A unit response represents any time a fire unit responds to an incident. Some incidents, such as a structure fire, require multiple fire units to respond to the same incident. Station 1 is located at 555 North Berry Street, Brea, California 92821; Station 2 is located at 200 North Brea Boulevard, Brea, California 92821; Station 3 is located at 2600 East Santa Fe Road, Brea, California 92821; and Station 4 is located at 198 North Olinda Place, Brea, California 92821.

Fire suppression is an integrated, interagency effort. The California Fire Service and Rescue Emergency Mutual Aid System, established by the Governor's Office of Emergency Services, divides the State into six regions. Orange County is in Region 1, which consists of coastal counties from Orange County to San Luis Obispo County. If assistance were needed for a fire in Orange County, mutual aid would be lent by other agencies in Region 1 first, then other regions in California. The Los Angeles County Fire Department, Fullerton Fire Department, OCFA, and Placentia Fire and Life Safety Department provide mutual aid.

4.16.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Project would have a significant impact on wildfire if it would:

- **Threshold WILD-a:** Substantially impair an adopted emergency response plan or emergency evacuation plan.
- **Threshold WILD-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.

- **Threshold WILD-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.
- **Threshold WILD-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.

4.16.3 Plans, Programs, and Policies

Compliance measures are regulations imposed uniformly by the approving agency based on the proposed action taken and are required of the Project to reduce its potential environmental effects. Because these features are standard requirements, they do not constitute mitigation measures. The following measures are existing plans, programs, or policies (PPP) that apply to the Project and will help to reduce and avoid potential impacts related to wildfire:

PPP PS-1 **Fire Regulations.** New buildings developed under the Focused General Plan Update and the Brea Core Specific Plan are required to meet the fire regulations outlined in California Health and Safety Code (Sections 13000 et seq.).

PPP PS-2 **Development Fees.** Development under the Focused General Plan Update and the Brea Core Specific Plan will be required to pay the latest adopted Development Fees (e.g., Fire Department plan check and inspection fees, fire service connection fees, dispatch impact fees, and fire impact fees), as applicable. .

PPP PS-3 **Brea Fire Code.** All development developed under the Focused General Plan Update and the Brea Core Specific Plan will be designed, built, and operated in accordance with the City of Brea's City Code, Chapter 15.08, Building Code, and Chapter 16.04, Brea Fire Code.

PPP PS-4 **Site and Design Review.** T he Brea Fire Department will require approval of Fire Plan Check for Site Plan and Emergency Access. Additional design features to address the Brea Fire Department's requirements will be incorporated as conditions of approval for development under the Focused General Plan Update and the Brea Core Specific Plan..

PPP PS-5 **Fire Safety Standards.** For each new development facilitated under the Focused General Plan Update and the Brea Core Specific Plan, fire plans shall be submitted and reviewed by the Brea Fire Department to ensure compliance with fire safety and emergency response standards.

PPP PS-6 **Fuel Modification Standards.** AAll development under the Focused General Plan Update will be designed, built, and operated in accordance with the Brea Fire

Department's Very High Fire Hazard Severity Zone–Fuel Modification requirements, if applicable.

PPP TRA-2 **Traffic Control and Staging.** A site-specific construction worksite staging and traffic control plan within the public right-of-way will be prepared and submitted to the City for review and approval prior to the start of any construction work. This plan will include such elements as the location of any potential partial lane closures within the public right-of-way, hours during which lane closures (if any) would not be allowed, local traffic detours (if any) that may require rerouting of traffic through the public right-of-way, and protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs). The project applicant will be required to comply with the City-approved plan measures, including any specific regulations for construction activities and traffic control in the public right-of-way.

The new or updated general plan goals and policies related to wildfire are included as Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the Program Environmental Impact Report (PEIR).

4.16.4 Environmental Impacts

The following sections address various potential impacts relating to wildfire that could result from implementation of the Project.

The analysis of environmental impacts related to wildfire considers the potential for new or increased wildfire risk from implementation of the Project, including exposing people or structures to wildfire-related pollutant concentrations or the uncontrolled spread of wildfire, and post-fire risks, such as slope instability or landslides. The analysis also evaluates the effects of the Project on emergency planning and evacuation in the event of a wildfire or other natural hazard, as well as any conflicts with existing emergency plans and policies. The analysis contained herein addresses potential wildfire risks from a programmatic-level and Citywide approach, recognizing that the Project will not directly result in construction or new development. Rather, future individual projects at various sites around the City would be facilitated by the Project through identification and changing land use designations for various parcels throughout the City. Individual projects would undergo project-specific review at the time of each development application.

4.16.4.1 Threshold WILD-a: Substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

Focused General Plan Update

The City administers a Fire Prevention and Emergency Preparedness Program, and Brea Fire Department provides emergency response for hazardous material incidents. This program consists of the development and maintenance of the City's emergency response plan and emergency operations center. It addresses appropriate responses to major wildfires and other disasters, such as earthquakes, hazardous materials accidents, and dam failure. Program objectives include injury reduction and avoiding loss of life and property damage through effective management of emergency forces. The Fire Prevention and Emergency Preparedness Program describes how emergency response will be coordinated and how evacuation of residents will proceed.

Evacuation and emergency access within the City rely primarily on arterial streets (e.g., Lambert Road, Imperial Highway/SR-90, Birch Street, Carbon Canyon Road/SR-142, State College Boulevard, Brea Boulevard, and SR-57 freeway). Portions of the City near the northern hills, Carbon Canyon, and other WUI areas have limited roadway access, making emergency planning in these areas critical. Fire hazard zones identified by CAL FIRE (Very High and High FHSZs) overlap these constrained areas, highlighting the importance of maintaining emergency access and evacuation routes. Implementation of the Focused GPU could affect emergency response and evacuation by facilitating development and increasing population or development intensity in areas with constrained access, such as hillside neighborhoods or WUI areas; altering the circulation network in ways that could impede emergency access or evacuation (e.g., street modifications, new private streets).

The Focused GPU involves changes in land use designations for various parcels throughout the City's planning area, allowing increased development densities. However, the planning area is largely developed and buildout of the planning area would largely come from redevelopment of already existing developed areas (i.e., infill development). During the construction and operation phases of the Project, development would not interfere with any of the daily operations of the BFC or the Orange County-City Hazardous Materials Emergency Response Authority team, which support emergency planning and response efforts in Brea. All construction activities would be performed according to Brea Fire Department's standards and regulations. Development facilitated by the Project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. The development facilitated by the Focused GPU would also be required to go through the City's development review and permitting process and incorporate all applicable design and safety standards and regulations in the CBC, CFC, and BCC Section 16.04 to ensure that project development does not interfere with the provision of local emergency services (provision of

adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

The Focused GPU supports policies promoting emergency preparedness, wildfire resilience, WUI development standards, and circulation improvements. The updated Public Safety Element specifically identifies Goal PS-1 which aims to create and support a community that is minimally impacted by wildland and urban fires through implementation of proactive fire hazard abatement strategies. Goal PS-6, another goal identified in the updated Public Safety Element, aims for a City that is well-prepared for emergency response and disaster management to minimize impacts to people, property, the environment, and essential services. Additionally, Goal CD-4 of the updated Community Development Element also identifies minimizing the extent of development in the hillsides and mitigating any adverse consequences associated with urbanization as a goal. Specific policies and actions that support these goals are included in Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions, to the PEIR. These policies are consistent with the City's existing emergency planning framework and the Local Hazard Mitigation Plan, and support ongoing coordination with OCFA and the County. Areas with limited evacuation routes, including Carbon Canyon and northern hill neighborhoods, are recognized in the Focused GPU. Policies ensure new development in these areas maintains adequate ingress/egress, adheres to fire-access standards, implements defensible space/fuel modification requirements, and coordinates with OCFA where necessary.

Therefore, the Project would not impair an emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The BCSP is not located within a Very High FHSZ. As shown on Figure 4.8-3, only a small portion of properties in the northeast corner of the BCSP boundary overlap with the Moderate FHSZ. The BCSP area also does not contain any areas of concern or any designated entry or exit points for emergency evacuation access, as identified in Brea's 2021 Public Safety Element. Therefore, implementation of the BCSP would not be expected to substantially impair Brea's adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.4.2 Threshold WILD-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.

Impact Analysis

Focused General Plan Update

The City is located in northern Orange County, at the interface between urban development and wildland areas. The northern and eastern portions of the City, including Carbon Canyon and hillside neighborhoods, are characterized by steep slopes, dense vegetation, and wildland fuels. These areas are designated as Very High FHSZ and High FHSZ by CAL FIRE.

Prevailing seasonal winds from the Santa Ana region, particularly in fall and winter, can drive rapid wildfire spread from surrounding hills and canyons into urbanized areas. Historically, the region has experienced multiple wildfires affecting adjacent communities, which pose threats both to property and public health. Smoke from wildfires contains particulate matter and pollutants that can adversely affect sensitive populations, including children, older adults, and individuals with respiratory conditions. The City's Local Hazard Mitigation Plan, along with OCFA operational standards, identifies wildfire exposure as a key hazard, particularly for residents in WUI areas.

Implementation of the Project has the potential to place future development within these wildfire-prone areas; however, the Focused GPU includes policies that reduce wildfire risks and associated exposure. The Focused GPU guides land uses away from the most hazardous areas where feasible and requires new development to adhere to fire-resilient design standards, including defensible space, fire-resistant building materials, and coordination with the OCFA for fuel modification (PPP PS-6), emergency access, and evacuation planning. These policies, along with project-level fire plans required during discretionary development approvals (PPP PS-5), help to minimize the potential for uncontrolled wildfire spread and limit occupant exposure to smoke and pollutants. While the plan cannot eliminate wildfire risk entirely, its policies ensure that future development is designed and managed to reduce fire hazard potential and protect public safety.

Collectively, incorporation of regulations and policies included in the Focused GPU as specified above would reduce the risk of the uncontrolled spread of a wildfire and associated pollutant concentrations that would result from new development facilitated by the Project. Therefore, with existing Federal, State, and local regulatory requirements for development, implementation of the Project would result in a less than significant impact related to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Therefore, implementation of the Focused GPU would not substantially exacerbate wildfire risks or increase exposure to wildfire-related pollutants, and impacts are considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The BCSP is not located in or near SRAs or lands classified as Very High FHSZs (Figure 4.8-3). Therefore, implementation of BCSP would not, 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. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.4.3 Threshold WILD-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

Impact Analysis

Focused General Plan Update

The implementation of the Project could involve construction, expansion, or maintenance of infrastructure necessary to support future development, such as roads, fuel breaks, emergency water sources, power lines, and other utilities. While these improvements are essential for public safety, emergency access, and fire prevention, they can also temporarily disturb soils, vegetation, and wildlife habitats, particularly in undeveloped or wildland-adjacent areas. For example, road construction or utility installation in hillside or Carbon Canyon areas may require grading, vegetation removal, or slope stabilization, which could temporarily increase the risk of erosion or sediment runoff. Similarly, the installation or maintenance of fuel breaks and emergency water infrastructure may require vegetation clearance, potentially impacting sensitive habitats or causing temporary disruption to wildlife.

At the same time, these infrastructure improvements are intended to reduce fire risk by facilitating emergency access, creating defensible space, and providing reliable water supply for firefighting. The Focused GPU includes policies that guide infrastructure planning and construction to minimize environmental impacts, such as requiring compliance with applicable City, OCFA, and State regulations, implementing erosion control measures during construction, avoiding or mitigating impacts to sensitive habitats, and maintaining natural vegetation where feasible. Additionally, all utility installations must comply with fire safety regulations, including standards for electrical equipment and fuel management around power lines, which help reduce the potential for infrastructure-related fire ignition.

Overall, while the installation or maintenance of infrastructure could cause temporary or localized environmental impacts, these impacts would be minimized through compliance with regulatory requirements, standard construction best management practices, and adherence to fire safety standards. Moreover, these improvements serve to enhance fire protection and reduce overall wildfire risk.

Future development, particularly in high fire risk areas of the County, would be required to comply with existing regulations developed by the State (e.g., CFC, CBC, PRC), County (e.g., Local Hazard Mitigation Plan), and City Code (Chapter 15.08, Building Code, of the BCC and Chapter 16.04, Brea Fire Code) which include various provisions for siting, construction, occupancy, and protection of development as it relates to wildfire hazards and reducing wildfire risks, wildfire exposure, and the uncontrolled spread of wildfires.

The development regulations and construction of infrastructure necessary to comply with these regulations would reduce the overall risk of wildfire hazards and associated impacts. Therefore, implementation of the Project would not substantially exacerbate fire hazards or result in significant environmental impacts from associated infrastructure, and impacts are considered less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The BCSP is not located in or near SRAs or lands classified as Very High FHSZs (Figure 4.8-3). Therefore, implementation of the BCSP would not, 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.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

Focused General Plan Update

Implementation of the Project could indirectly influence exposure to hazards such as post-fire flooding, debris flows, erosion, and landslides, particularly in areas located within or adjacent to the City's hillside terrain and the WUI. Portions of northern Brea, including Carbon Canyon and steep hillside neighborhoods, contain slopes susceptible to erosion and instability, conditions that

can be exacerbated following wildfire events when vegetation loss reduces soil cohesion and increases surface runoff. Post-fire hydrologic changes can result in short-term increases in sediment transport, localized flooding, and debris flows, particularly during intense rainfall events. Drainage alterations associated with future development including grading, installation of stormwater infrastructure, or increased impervious surfaces—could contribute to changes in runoff patterns if not properly managed, potentially increasing risks to people, property, or public infrastructure in downstream areas.

The Focused GPU includes policies that reduce these risks by requiring new development to comply with applicable City and State regulations for geotechnical stability, runoff management, and hillside development. These include requirements for site-specific geotechnical investigations, erosion control measures, slope stabilization where necessary, and adherence to stormwater management standards that prevent increases in runoff volumes or velocities. In addition, the plan supports wildfire-resilience measures such as fuel modification, defensible space requirements, and vegetation management that reduce the likelihood of intense burns that could lead to severe post-fire slope instability. Compliance with the CBC, grading ordinances, and the National Pollutant Discharge Elimination System (NPDES) requirements further ensures that development incorporates engineering and design practices that avoid significant increases in erosion or geologic hazards.

While wildfire and post-fire slope instability are inherent risks in hillside and WUI areas, the policies contained in the Focused GPU ensure that new development is sited, designed, and engineered to minimize potential exposure to such hazards. By requiring appropriate drainage design, erosion control, and geotechnical analysis, and by supporting vegetation management and fire-resilience measures, the Focused GPU would not expose people or structures to significant risks associated with post-fire flooding, landslides, or altered runoff patterns. As previously discussed, all potential future development within wildfire-prone areas in the City would also be required to comply with CFC, CBC, PRC, and other State and local regulations addressing the development and design of habitable structures to safeguard public health and reduce fire hazards.

In addition, as discussed in Section 4.9, Hydrology and Water Quality, future development associated with the Project would be subject to stormwater management regulations, which require structural stormwater control measures (e.g., retention basins and stormwater conveyance infrastructure) to be adequately sized for substantial rainfall events. Additionally, development facilitated by the Project would comply with BCC Chapter 20.276 of the which establishes a Flood Hazard Overlay Zoning District to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas by creating legally enforceable regulations to be applied uniformly throughout the community to all publicly and privately owned land within flood-prone areas.

Impacts relating to flooding were determined to be less than significant in Section 4.9, and impacts related to post-wildfire hazards would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

Brea Core Specific Plan

The BCSP is not located in or near SRAs or lands classified as Very High FHSZ (Figure 4.8-3). Therefore, implementation of the BCSP would not, 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. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.5 Cumulative Impacts

The following sections address various potential cumulative impacts relating to wildfire that could result from implementation of the Proposed Project. Consistent with Section 15130(b)(1) of the CEQA Guidelines, the cumulative analysis in this PEIR uses a general plan projections approach. The Proposed Project includes both the Focused GPU and the BCSP, as identified in the Focused GPU buildout (see Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR). Therefore, the cumulative analysis for both the Focused GPU and the BCSP is the same.

4.16.5.1 Cumulative Threshold WILD-a: Substantially impair an adopted emergency response plan or emergency evacuation plan.

Focused General Plan Update and Brea Core Specific Plan

The City's ability to maintain effective emergency response and evacuation is influenced not only by local conditions but also by development and wildfire risk in adjacent communities, including Yorba Linda, Chino Hills, and unincorporated areas of northern Orange County. Regional population growth, development in wildfire-prone areas, and potential constraints on roadway access could place additional demand on emergency services and evacuation routes, increasing the risk of congestion or delayed response during wildfire or other emergency events.

The Focused GPU, in combination with past, present, and reasonably foreseeable development, could contribute to cumulative pressures on local and regional emergency management systems. However, the City's policies supporting fire-resilient development, maintenance of emergency access, coordination with the OCFA, and compliance with State and County emergency planning standards help ensure that new development does not compromise evacuation routes or the

effectiveness of emergency response. Moreover, regional coordination through the Orange County Operational Area and emergency management planning mitigates potential cumulative impacts on response times and evacuation efficiency. Cumulative impacts to emergency response or evacuation plans could occur if the Project, in combination with other cumulative projects, substantially impaired implementation of emergency response or evacuation efforts in the County. The Project would not contribute to impairment of an emergency response or evacuation plan. Just as future development facilitated by the Project would be required to comply with the State, County, and City requirements for adequate emergency access, it is reasonable to assume that cumulative projects would be subject to the same or similar standards. Therefore, emergency response and evacuation would be addressed on a project-by-project basis, with each potential project complying with regional and local access requirements. Therefore, cumulative impacts to emergency response and evacuation would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.5.2 Cumulative Threshold WILD-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.

Focused General Plan Update and Brea Core Specific Plan

Cumulative projects, in combination with future development facilitated by the Focused GPU and BCSP, in the WUI, in High or Very High FHSZs, and on steep slopes could result in an increase in the risk of ignitions. However, the City's policies promoting fire-resilient development, adherence to CAL FIRE-designated FHSZs, defensible space requirements, fuel modification, and coordination with the OCFA reduce the likelihood that local development would exacerbate wildfire spread beyond the City's boundaries. Additionally, regional emergency response coordination, evacuation planning, and air-quality advisories provide further safeguards against cumulative health impacts from wildfire smoke. Each cumulative project requiring development permits would likely undergo design review to determine what, if any, fire protection measures would be required for the Project, depending on the site-specific location.

For example, future development within the City would be required to include fire protection measures, such as automatic sprinkler systems, fire detection and alarm systems, fire breaks, fire-retardant building materials, fuel modification measures, fire-resistant landscaping, adequate water supply, appropriate signage and building numbering, alternative access routes, and adequate emergency access. For the same reasons as the Project, cumulative project compliance with State and local fire protection requirements and standards would reduce the risk of the uncontrollable

spread of wildfire and associated pollutant concentrations. Therefore, the Project's contribution to cumulatively considerable impacts related to fire risk would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.5.3 Cumulative Threshold WILD-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.

Focused General Plan Update and Brea Core Specific Plan

The potential environmental effects of infrastructure associated with wildfire protection such as roads, fuel breaks, emergency water sources, and utility lines extend beyond the City, as wildfire risk and emergency access are regional concerns. Cumulative impacts could arise if multiple jurisdictions within northern Orange County, including but not limited to Yorba Linda, Chino Hills, and unincorporated areas, construct or maintain similar infrastructure in or adjacent to WUI areas. Collectively, these activities could lead to temporary disturbance of soils, vegetation, and wildlife habitats, particularly where grading, vegetation clearance, or utility installation occurs on slopes or in sensitive habitats. Furthermore, regional installation of utilities or fuel modification projects could temporarily increase erosion, sedimentation, or habitat fragmentation if not properly managed.

However, these impacts would be addressed through adherence to established best management practices, regulatory compliance, and fire safety standards. Projects are required to implement erosion control, minimize vegetation removal, protect sensitive species and habitats, and coordinate with local fire authorities. Because infrastructure improvements are designed primarily to reduce wildfire risk by enhancing emergency access, providing water for firefighting, and creating defensible space, the cumulative effect of such development would not substantially exacerbate wildfire hazards or generate significant ongoing environmental impacts.

Each cumulative project requiring development permits would likely undergo design review to determine what, if any, fire protection measures would be required for the Project, depending on the site-specific location. For the same reasons as the proposed Project, cumulative project compliance with State and local fire protection requirements and standards would reduce fire risk.

Consequently, implementation of the Project, in combination with past, present, and reasonably foreseeable infrastructure development in surrounding communities, would not result in a cumulatively considerable contribution to wildfire-related impacts. Therefore, cumulative impacts on the environment from the installation or maintenance of infrastructure associated with the Project would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.5.4 Cumulative Threshold WILD-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.

Focused General Plan Update and Brea Core Specific Plan

Risks associated with post-fire flooding, debris flows, erosion, and landslides are inherently regional in nature because wildfires, storm events, and unstable slopes do not adhere to jurisdictional boundaries. Communities surrounding Brea which include but are not limited to Yorba Linda, Chino Hills, and unincorporated Orange County contain similar hillside and WUI conditions where wildfire can lead to vegetation loss and subsequent slope instability. As regional wildfire frequency and severity continue to increase due to climate change, drought, and hotter temperatures, the potential for widespread post-fire hydrologic impacts, such as downstream flooding and debris flows, increases across the broader landscape. Concurrent development in multiple jurisdictions also has the potential to alter drainage patterns, expand impervious surfaces, and increase cumulative stormwater volumes that may exacerbate downstream flooding risks if improperly managed. All development, including development facilitated by the Project and cumulative projects, located in areas downslope of steep WUI areas, near drainage corridors, and within expanded floodplains are susceptible to wildfire and potential post-wildfire hazards, such as flooding and landslides.

However, development in Brea and surrounding jurisdictions is subject to stringent geotechnical, drainage, and stormwater regulations—such as the CBC, local grading ordinances, NPDES requirements, and hillside development standards—that minimize the potential for new development to contribute to post-fire slope failures or drainage hazards. Regional wildfire-mitigation practices, including coordinated fuel modification, defensible space requirements, and OCFA and countywide emergency response planning, further reduce the likelihood that wildfires will cause severe post-fire hydrologic instability across the region. The policies in the Focused GPU reinforce these regional protections by requiring new development to incorporate geotechnical analysis, drainage controls, erosion-reduction measures, and fire-resilience strategies that prevent significant alterations to slope stability or stormwater flows.

As described in Section 4.9, cumulative projects, in combination with future development under the Project, would result in an incremental increase in impervious surfaces in areas that overlie groundwater basins, changes in localized drainage, and possible development within a floodway or floodplain zone. As with the Project, other cumulative projects would be required to implement site design, structural, LID, and treatment control BMPs pursuant to their applicable MS4 permits and Regional Water Quality Control Board and local code requirements. Jurisdictions in the watersheds regulate development within 100-year flood zones to minimize hazards to public safety

and alterations of flood flows. Each cumulative project requiring development permits would likely undergo design review to determine if any adverse effects to hydrology and flooding would occur, depending on the site-specific location. Cumulative project compliance with flooding and drainage regulations, as well as wildfire protection requirements, on a project-by-project basis would reduce the potential for flooding and landslides. Therefore, cumulative impacts to post-wildfire flooding or landslides would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.16.6 Level of Significance Before Mitigation

Environmental impacts related to Thresholds WILD-a through WILD-d would be less than significant with compliance with all applicable regulatory requirements as outlined in PPP PS-1 through PPP PS-6, and PPP T-1 and applicable Focused GPU goals, policies, and actions (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions).

4.16.7 Mitigation Measures

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

4.16.8 Level of Significance After Mitigation

Not applicable.

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Chapter 5 Effects Found Not to Be Significant

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The City of Brea (City), as the lead agency, reviewed the proposed Brea 2050: Focused General Plan Update (Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project) against the environmental issue areas in Appendix G of the CEQA Guidelines. All environmental issue areas, including those found to have potentially significant impacts, except the following, are addressed in Chapter 4, Environmental Analysis, of this Program EIR (PEIR): agriculture and forestry service, geology and soils (except for impacts related to paleontological resources), mineral resources, population and housing, and recreation. These environmental issue areas were determined to result in no impacts or less than significant impacts from implementation of the Proposed Project and, therefore, are addressed separately in this chapter.

5.1 Agriculture and Forestry Resources

Threshold AG-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?

Focused General Plan Update

No Impact. The Project would not convert any 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 Natural Resources Agency, to non-agricultural use. Although the Project area contains prime farmland, farmland of Statewide importance, and unique farmland pursuant to the California Important Farmland Finder, these areas are part of the approved Brea 265 Specific Plan and already approved for development. No land use designation changes would occur from the Focused GPU (DOC 2022). No impact would occur.

Brea Core Specific Plan

No Impact. The Project would not convert any farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use (DOC 2022). The BCSP area does not include any agricultural land, and no impact would occur.

Threshold AG-b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Focused General Plan Update and Brea Core Specific Plan

No Impact. The California Land Conservation Act of 1965 (Williamson Act) enables counties and cities to designate agricultural preserves and offer preferential taxation based on a property's agricultural-use value rather than on its market value. In return for the preferential tax rate, the landowner is required to sign a contract with the county or city in which the landowner agrees not to develop the land for a minimum 10-year period. There are no areas in the City, including the BCSP area, that are zoned for agricultural use. As shown on Figure 2-6, Existing Zoning in the Brea Core Specific Plan Area, there are no areas in the City and Sphere of Influence (SOI) that are zoned for agricultural use. No impact would occur.

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

Focused General Plan Update

No Impact. The City and its SOI do not have any zoning for forest land, timberland, or timberland production and, therefore, would not conflict with existing zoning for those uses. Forest land is defined as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (PRC Section 12220). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (PRC Section 4526). Pursuant to the Farmland Mapping and Monitoring Program of the California Natural Resources Agency, the Project area is identified as Urban and Built-Up Land and Other Land. Other Land areas are designated as Open Space and Hillside Residential by the 2003 Brea General Plan (City of Brea 2003). No changes to these designations would occur as a result of Project implementation. Therefore, no conflict with existing zoning pertaining to forest land or timberland is anticipated. No impact would occur.

Brea Core Specific Plan

No Impact. As described in Chapter 2, Project Description, there are no existing zoning for forest land, timberland, or timberland production within the Project area, including the BCSP area. Therefore, no conflict with existing zoning pertaining to forest land or timberland is anticipated. No impact would occur.

Threshold AG-d. Result in the loss of forest land or conversion of forest land to non-forest use?

Focused General Plan Update and Brea Core Specific Plan

No Impact. The Project would not result in the loss or conversion of forest land. The existing 2003 Brea General Plan identifies 374 acres of Open Space designation within the incorporated City boundaries and 3,382 acres in the SOI. The Focused GPU would not change any of the open space designations within the City or SOI boundaries. Also, the BCSP area is fully developed, and no forest land is within the BCSP boundaries. Therefore, the Project would not result in the loss of forest land or conversion of forest land or non-forest use. No impact would occur.

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

Focused General Plan Update and Brea Core Specific Plan

No Impact. As discussed under Section 5.1(a) and Section 5.1(c), no changes to existing agricultural or forest land would occur as a result of the Project. No changes that could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use would occur. No impact would occur.

5.2 Geology and Soils

Threshold GEO-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.**

Focused General Plan Update

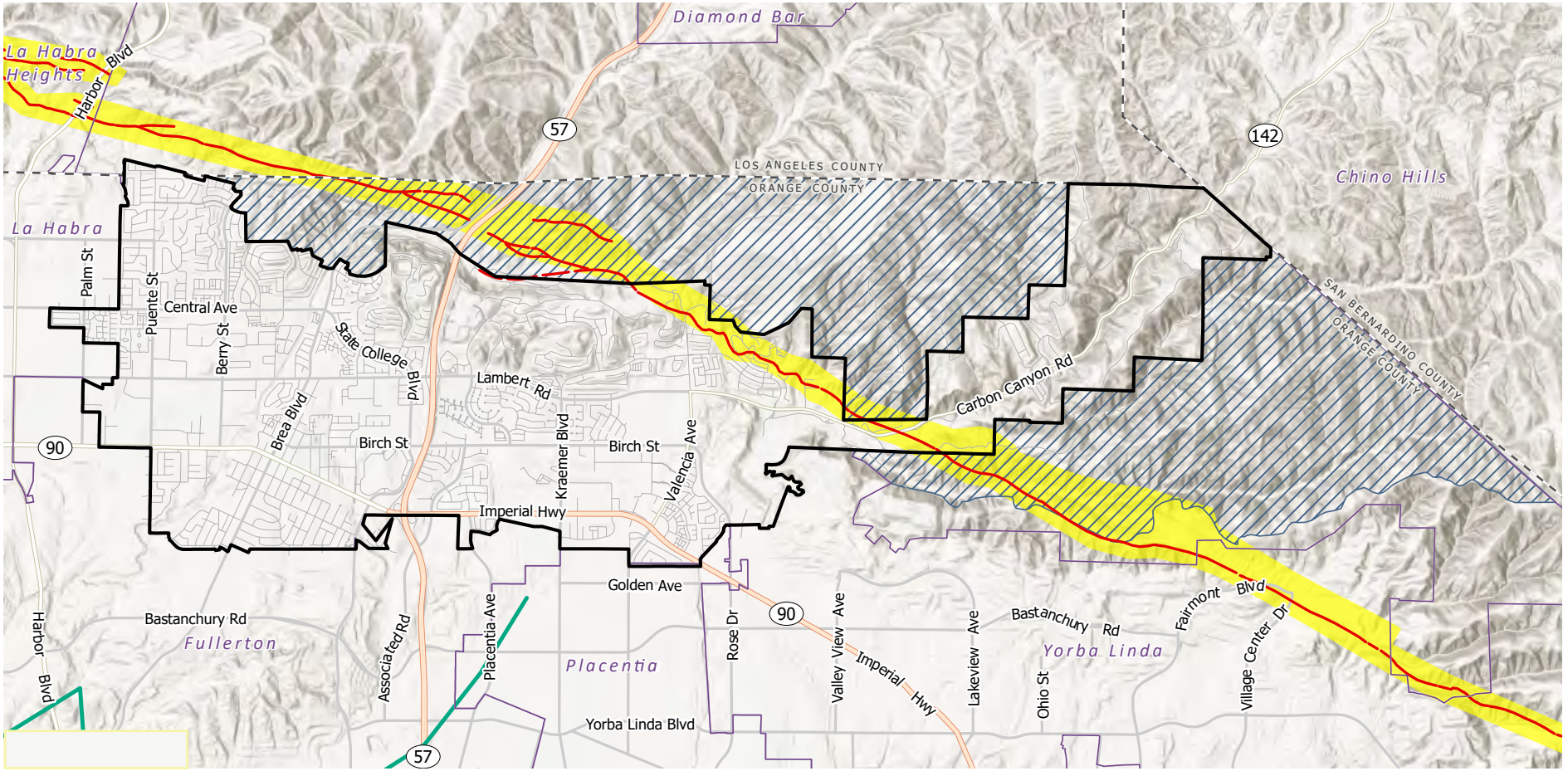
Less than Significant Impact. The northeastern portion of the City is traversed by the Whittier Fault, which is within the Yorba Linda Quadrangle of the Alquist-Priolo Earthquake Fault Zones map. Figure 5-1, Alquist Priolo Fault Zone, shows the approximate location of the fault line. The Whittier Fault extends northwest beyond the City's incorporated boundaries into the SOI and Los Angeles County and southeast toward Chino Hills State Park and the City of Yorba Linda. Within the City, the fault crosses hillside areas generally designated for Hillside Residential (HR), Natural Open Space, Low Density Residential, Medium Density Residential, and Parks/Recreation/Open Space uses. According to the City's General Plan Public Safety Chapter (City of Brea 2021), the Elysian Park Thrust Fault, a buried fault approximately 6 to 10 miles below the ground surface, also underlies portions of the City's Project area and has the potential to generate a large-magnitude earthquake.

The Proposed Project would increase the total number of residential units allowed within the HR designation compared to existing conditions. However, this represents a reduction from the residential potential allowed under the adopted 2003 Brea General Plan within the incorporated City boundaries and no change within the SOI. Therefore, the Proposed Project would not substantially increase the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the Alquist-Priolo Earthquake Fault Zoning Map.

All development within the City is subject to the Alquist-Priolo Earthquake Fault Zoning Act, which requires site-specific geologic investigations prior to approving structures intended for human occupancy within mapped fault zones. Title 14, California Code of Regulations, Section 3603, and related provisions specify the required contents, preparation, and submission procedures for such geologic or fault studies. In addition, all new construction must comply with the seismic design standards of the California Building Code (CBC) and incorporate project-specific geotechnical recommendations into building plans and field construction. Furthermore, the Brea City Code (BCC), Section 20.280, Special Geological Studies (SGS) Zone, establishes additional local requirements for projects located within designated SGS Overlay Districts. The purpose of this overlay is to protect life and property from potential fault hazards by requiring evaluation of geologic conditions prior to approval of any development permit or tentative map. For any discretionary project located wholly or partially within an SGS Zone, the project applicant must prepare a Special Geologic Study Zone Analysis and submit it to the Community Development Director for review. The Special Geologic Study Zone Analysis is required to include (1) location and existence (or absence) of hazardous faults on or adjacent to the site; (2) type of faults and nature of anticipated offset: direction of relative displacement and maximum displacement that is possible; and (3) probability of or relative potential for future surface displacement; and degree of confidence in and limitations of data and conclusions, as well as provide recommendations regarding setback distances from hazardous faults, if appropriate, and risk evaluations relative to the proposed development. Compliance with the applicable State and local regulatory requirements described above would ensure that the Proposed Project does not expose people or structures to substantial adverse effects related to earthquake fault rupture. Therefore, impacts would be less than significant, and no mitigation measures are required.

Brea Core Specific Plan

No Impact. The BCSP area is not within the Alquist-Priolo Earthquake Fault Zones. Therefore, the Proposed Project would not be adversely affected by the Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. No impact would occur.



LEGEND

- Brea City Boundary
- Brea Sphere of Influence
- County Boundary
- Other Incorporated Area
- Elsinore fault zone
- Puente Hills blind thrust system
- Alquist-Priolo Zone of Required Investigation

Source: De Novo Planning Group, 2026.

Harris & Associates

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Figure 5-1

Alquist Priolo Fault Zone

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ii. Strong seismic ground shaking?

Focused General Plan Update and Brea Core Specific Plan

Less than Significant Impact. Many physical assets in the City are estimated to experience the seismic shaking intensity, ranging from 0.751 to 1.05g (shaking intensity in relation to the Earth's gravity) (City of Brea 2024). The potential seismic shaking potential for the City's Project area is shown on Figure 4-2, CFs and FOCs Located in Potential Seismic Shaking Hazard Zones, of the City of Brea Local Hazard Mitigation Plan (City of Brea 2024). Therefore, all facilities could be damaged during a significant seismic event. To ensure the structural integrity of all buildings and structures, the Proposed Project must conform to the seismic requirements outlined in the CBC. Also, the City of Brea adopted the Orange County Grading and Excavation Code in its entirety (BCC Chapter 15.30; Grading and Excavation Code, Section 15.30.010). The Orange County Grading Excavation Code requires grading permits from the Building Official to conduct any grading, clearing, brushing, or grubbing on natural or existing grade that is preparatory to grading (Article 8, Orange County Grading and Excavation Code, Subarticle 5, Grading Permit Requirements). Each grading permit application is required to be accompanied by plans and specifications and supporting data consisting of geotechnical/soil engineering and engineering geology reports (Orange County Grading and Excavation Code, Section 7-1-817). A geotechnical/soil engineering and engineering geology report is required for grading projects, unless otherwise waived by the City's Building Official. The report is required to include information appropriate for the site, including any information required by the Building Official and currently adopted CBC. Recommendations included in the reports and approved by the Building Official must be incorporated into the grading plans or specifications before the issuance of the grading permit. Therefore, compliance with the CBC, Orange County Grading and Excavation Code, and geotechnical/soil engineering and engineering geology report recommendations would ensure the Proposed Project would not result in a potentially significant impact from exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Focused General Plan Update and Brea Core Specific Plan

Less than Significant Impact. Liquefaction typically occurs when a site is located in a seismic zone, on-site soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative density is less than about 70 percent.

Portions of the Project area, including portions of BCSP, have high liquefaction potential as mapped by the California Geological Survey Earthquake Zones of Required Investigation.

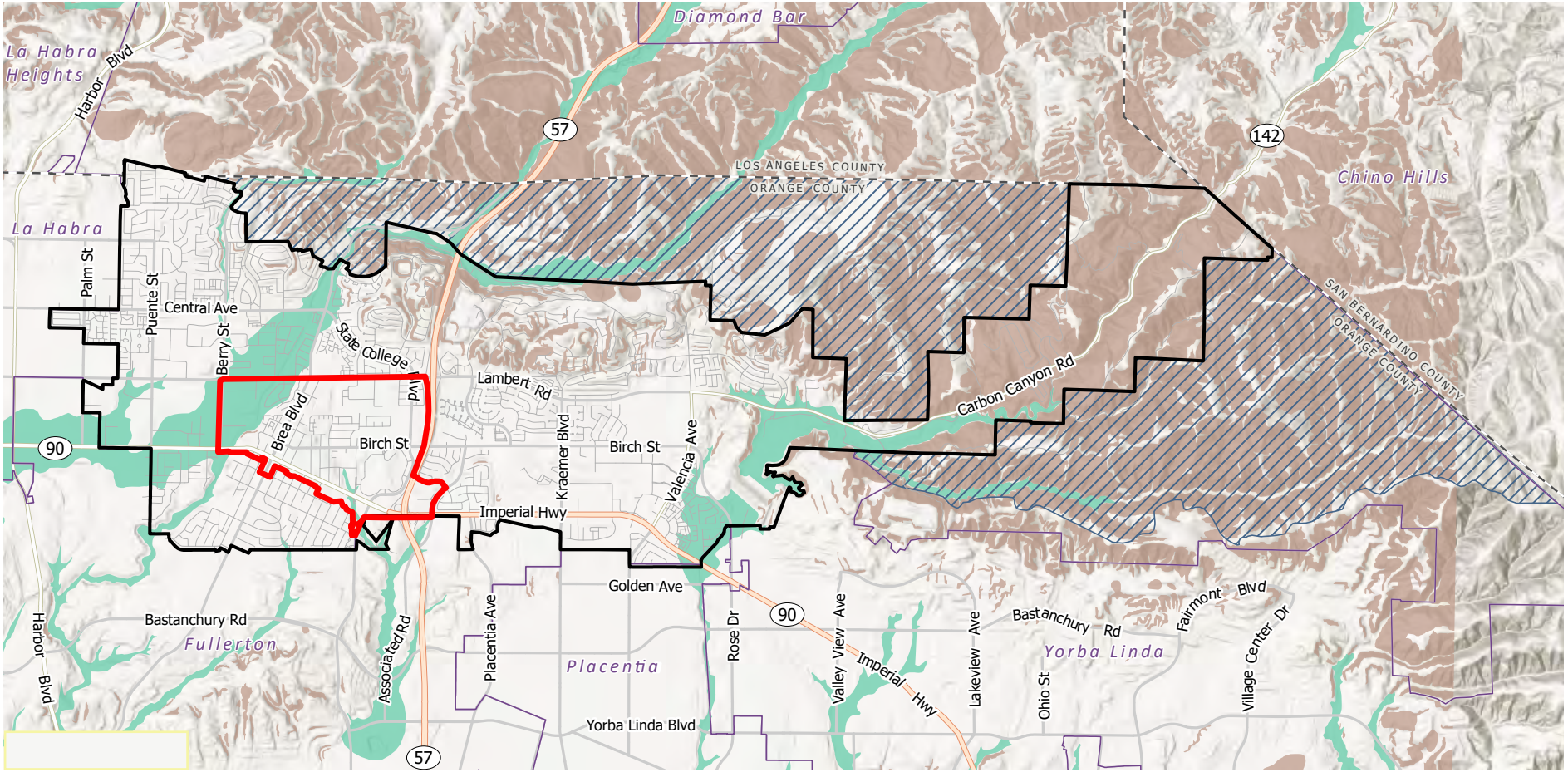
Development resulting from the Proposed Project has the potential to occur in places or in a manner that would result in the exposure of development and future residents to seismic-related ground failure, including liquefaction. However, numerous State and local regulations would apply to all

future development resulting from the Proposed Project and adequately address these hazards. For instance, all development would be subject to compliance with the CBC and the Orange County Grading and Excavation Code and would require geotechnical/soil engineering and engineering geology report recommendations, among others, to reduce or prevent impacts associated with seismic-related ground failure. The soil engineering report is required to include data regarding the nature, distribution, and strength of existing soils; conclusions and recommendations for grading procedures and design criteria for corrective measures when necessary; and opinions and recommendations covering the adequacy of sites to be developed by the proposed grading. The engineering geology report shall include an adequate description of the geology of the site, conclusions and recommendations regarding the effect of geologic conditions on the proposed development, and opinions and recommendations covering the adequacy of sites to be developed by the proposed grading. Recommendations included in the reports and approved by the Building Official must be incorporated into the grading plans and specifications. The Proposed Project does not include any plans, policies, or programs that would modify these existing regulations or exempt future development from mandatory compliance with these requirements. Therefore, the implementation of the Proposed Project would have less than significant impacts related to seismic-related ground failure, including liquefaction.

iv. Landslides?

Focused General Plan Update

Less than Significant Impact. Portions of the Project area are susceptible to landslides, generally including areas north of Lambert Road on the western side of Valencia Avenue and areas north of Lakeview Avenue and Bastanchury Road on areas east of Valencia Avenue. Figure 5-2, Seismic Hazards, illustrates landslide zones and liquefaction zones in the Project area. Development of properties in areas susceptible to landslides has the potential to increase exposure of future residents to risk from landslides. However, numerous State and local regulations would apply to all future development in the Project area and adequately address this hazard. For instance, all developments would be subject to compliance with the CBC and Orange County Grading and Excavation Code and would require geotechnical/soil engineering and engineering geology report recommendations, among others, to reduce or prevent impacts associated with landslides. Pursuant to the Orange County Grading and Excavation Code, applicants for a proposed use triggering the need for a grading permit are required to prepare and submit a soil engineering report and an engineering geology report for review and approval by the City Building Official. Recommendations included in the reports are required to be incorporated into the grading plans and specifications. The Proposed Project does not include any plans, policies, or programs that would modify these existing regulations or exempt future development from mandatory compliance with these requirements. Therefore, the implementation of the Proposed Project would have less than significant impacts related to landslides.



LEGEND

- Brea City Boundary
- Brea Sphere of Influence
- County Boundary
- Brea Core Specific Plan Area
- Other Incorporated Area
- Landslide Zone
- Liquefaction Zone

Source: De Novo Planning Group, 2026.

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Figure 5-2

Seismic Hazards

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Brea Core Specific Plan

Less than Significant Impact. Small portions of the BCSP area adjacent to the Brea Canyon Channel are within a Landslide Zone pursuant to the California Geological Survey Earthquake Zones of Required Investigation map. When a property is within the mapped areas where earthquake-induced landslides are likely to occur, PRC Sections 2690–2699.6 require a site-specific geotechnical investigation and local agency approval before development permits can be issued for structures intended for human occupancy. Such site-specific geotechnical investigation is to be prepared by a Registered Civil Engineer or Certified Engineering Geologist and characterize site geology, soil, and slope stability; evaluate the potential for seismic slope failure; include factor-of-safety analyses or equivalent stability modeling; and provide recommendations to ensure that impacts are minimized for safety. Such geotechnical reports are also required prior to issuance of a grading permit pursuant to Orange County Grading and Excavation Code, Section 7-1-817. Recommendations in the reports are required to be incorporated into the grading plans and specifications. The BCSP does not include any policies or programs that would modify these existing regulations or exempt future development from mandatory compliance with these requirements. Therefore, the implementation of the Proposed Project would have a less than significant impact related to landslides.

Threshold GEO-b. Result in substantial soil erosion or the loss of topsoil?

Focused General Plan Update and Brea Core Specific Plan

Less than Significant Impact. Construction of development accommodated by the Proposed Project could result in soil erosion or loss of topsoil. Development of individual projects would likely require grading to construct infrastructure such as roads, utilities, and building pads. Site preparation and construction activities would disturb soils, increasing their susceptibility to erosion by wind or water. Such erosion can undermine structures, roads, and other improvements and may contribute to sedimentation in local streams or water bodies. Erosion impacts may occur during short-term construction or long-term operation if disturbed areas are not properly stabilized or revegetated.

To minimize erosion during construction, future implementing projects would be required to prepare and comply with a Stormwater Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The SWPPP must identify and implement best management practices (BMPs) for temporary erosion and sediment control, such as phased grading, limiting the extent of disturbance, establishing restricted entry zones, diverting runoff from disturbed areas, protecting sensitive resources, stabilizing outlets, and providing revegetation or mulching of exposed soils. Implementation of these BMPs would reduce erosion and sedimentation impacts to a less than significant level during construction.

Furthermore, BCC Section 13.32.030 (Control of Urban Runoff) requires all new development and significant redevelopment to comply with the Orange County Drainage Area Management

Plan (DAMP) prior to issuance of grading, building, or non-residential plumbing permits. The DAMP establishes procedures and standards to meet NPDES stormwater permit requirements and mandates that the City review project plans to ensure appropriate terms, conditions, and erosion control measures are incorporated.

Compliance with the SWPPP, DAMP, and applicable State and local stormwater regulations would ensure that erosion and sedimentation impacts associated with Project construction and operation remain less than significant. No mitigation measures are required.

Threshold GEO-c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Focused General Plan Update and Brea Core Specific Plan

Less than Significant Impact. Development resulting from the Proposed Project has the potential to occur in places or in a manner that would be exposed to hazards due to soil instability. However, numerous State and local regulations would apply to all future development resulting from the Focused GPU and the BCSP, which adequately address this hazard. For instance, all development would be subject to compliance with the CBC and Orange County Grading and Excavation Code and would require geotechnical/soil engineering and engineering geology report recommendations, among others, to reduce or prevent impacts associated with unstable soils. Pursuant to the Orange County Grading and Excavation Code, applicants for a proposed use triggering the need for a grading permit are required to prepare and submit a soil engineering report and an engineering geology report for review and approval by the City Building Official. The required geotechnical/soil engineering and engineering geology report would identify potential for hazards related to unstable soil conditions on individual sites so the Proposed Project can be designed to reflect site-specific geologic and soils conditions and prevent risks due to lateral spreading, subsidence, liquefaction, or collapse.

The Focused GPU would update the Public Safety Element mainly to update the maps, including Geologic Faults, Seismic Hazards, and Landslide Susceptibility maps, to reflect updated information and meet the new document format. The Public Safety Element would continue to set goals and policies to protect and safeguard Brea residents from geologic hazards, including but not limited to a geologic unit or soil that is unstable that could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Also, the BCSP does not include any plans, policies, or programs that would modify the existing regulatory requirements related to grading and building construction. Therefore, the implementation of the Focused GPU and BCSP would have a less than significant impact related to unstable geologic units or soils.

Threshold GEO-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?

General Plan Update Focused and Brea Core Specific Plan

Less than Significant Impact. Expansive soils are those possessing clay particles that react to moisture changes by shrinking (when dry) or swelling (when wet). Expansive soils can also consist of silty to sandy clay. The extent of shrinking and swelling is influenced by the environment, such as alternating wet and dry cycles, by the amount of clay in the soil. The physical change in the soils can react unfavorably with building foundations, concrete walkways, swimming pools, roadways, and masonry walls.

All development would be subject to compliance with the CBC and Orange County Grading and Excavation Code and would prepare and comply with a site-specific geotechnical/soil engineering and engineering geology report, among others, to reduce or prevent impacts associated with expansive soils. Recommendations in the reports are required to be incorporated into the grading plans and specifications. The Proposed Project does not include any plans, policies, or programs that would modify these existing regulations or exempt future development from mandatory compliance with these requirements. Therefore, with compliance with the CBC and BCC, implementation of the Proposed Project would have a less than significant impact related to expansive soils.

Threshold GEO-e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Focused General Plan Update and Brea Core Specific Plan

Less than Significant Impact. The local sewage collection system provides wastewater collection services to all areas within the City's corporate boundaries, portions of unincorporated Orange County, and a small portion of Placentia. Future development within the Project area under the Proposed Project would use the local sewer system and would be required to comply with the Focused GPU Community Development Element, Goal CD-5, infrastructure-related policies to provide sufficient levels of water, sewer, and storm drain service throughout the community. Future development projects facilitated by the Proposed Project would not use septic tanks or an alternative wastewater disposal system. Therefore, impacts that would result from soil conditions in relation to septic tank or other on-site wastewater disposal systems would be less than significant.

Threshold GEO-f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Refer to Section 4.6, Geology and Soils, for discussion of the Proposed Project's potential to disturb potentially significant paleontological resources. As described therein, impacts related to disturbance of potentially significant paleontological resources would be less than significant with mitigation.

5.3 Mineral Resources

Threshold MIN-a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?

Focused General Plan Update

Less than Significant Impact. The California Department of Conservation's Geologic Energy Management Division (CalGEM) GIS Well Finder identifies numerous active, idle, and plugged oil and gas wells along the southern edge of the Puente Hills in northern Orange County and adjacent areas of Los Angeles County (CalGEM 2025). Brea was historically founded as an oil-producing community, as the name "Brea" is derived from the Spanish word for tar suggests, and several oil fields within the City still contain producing wells and associated petroleum and natural gas facilities. Production levels vary with global energy prices, and many wells have been closed and abandoned after years of operation. Although known mineral resources of regional and Statewide value occur within the City's Project area, these areas are already designated for various land uses. Implementation of the Focused GPU would not increase the loss or depletion of these resources. Existing oil and gas operations are required to comply with applicable State and Federal regulations, including requirements for proper closure and site cleanup when operations cease. Therefore, impacts related to mineral resources would be less than significant, and no mitigation is required.

Brea Core Specific Plan

No Impact. There are no known mineral resources within the BCSP area. The BCSP area is already developed with a variety of land uses, and implementation of the BCSP would not adversely affect the availability of any known mineral resources. Therefore, no impact would occur.

Threshold MIN-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?

Focused General Plan Update

Less than Significant Impact. CalGEM GIS Well Finder identifies numerous active, idle, and plugged oil and gas wells along the southern edge of the Puente Hills in northern Orange County and adjacent areas of Los Angeles County (CalGEM 2025). However, the City's General Plan and other land use plans do not designate any locally important mineral resource recovery sites, nor do they include

specific goals or policies related to mineral resource management other than to protect the community from the hazards associated with the transportation, use, and storage of hazardous materials in the urban environment (Goal PS 4), including from the oil and natural gas production, and to minimize the public's exposure to potential hazards associated with existing and abandoned oil facilities (Goal PS 5). While the Focused GPU would intensify urban land uses within the Project area, these planning areas are already designated for development. The Proposed Project does not include any plans, policies, or programs that would deplete or otherwise affect the availability of known mineral resources of regional or Statewide value within the Project area. Therefore, potential impacts related to mineral resources would be less than significant, and no mitigation measures are required.

Brea Core Specific Plan

No Impact. There are no known mineral resources within the BCSP area. The BCSP area is already developed with a variety of land uses, and implementation of the BCSP would not adversely affect the availability of any known mineral resources. Therefore, no impact would occur.

5.4 Population and Housing

Threshold PH-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)?

Focused General Plan Update and Brea Core Specific Plan

Less than Significance Impact. The City has experienced and continues to experience steady population growth, as shown in Table 5-1, Brea and Regional Population Growth Trends. From 2000 to 2010, Brea's population increased by 10.9 percent, and from 2010 to 2020, by 16.2 percent. According to the Southern California Association of Governments (SCAG), the City is projected to continue growing over the next 2 decades. SCAG's regional growth forecast estimates that Brea's population would increase from approximately 46,900 in 2019 to about 54,585 by 2050, representing a difference of 7,685 persons, or a 16.4 percent increase. It should be noted that this 2050 estimate is an extrapolation, as the Connect SoCal 2024 plan provides jurisdiction-level projections for modeling purposes only and does not explicitly publish City-specific population forecasts beyond the County level. To derive a reasonable local estimate, the County-level population-to-household (P:H) ratio of 2.774 was applied to Brea's forecasted increase of 2,800 housing units between 2019 and 2050.

Table 5-1. Brea and Regional Population Growth Trends

Jurisdiction	1990	2000	2010	2020	Percent Change		
					1990–2000	2000–2010	2010–2020
Brea	32,873	35,410	39,282	45,629	7.7%	10.9%	16.2%
Orange County	2,410,556	2,846,289	3,010,232	3,194,332	18.1%	5.8%	6.1%

Source: City of Brea 2022.

As shown in Table 5-2, SCAG Projections, City of Brea and Orange County, between 2019 and 2050, housing units in the City are forecast to increase from 17,100 to 19,900 (a 16.3 percent increase), and employment from 54,600 to 57,400 jobs (a 5.1 percent increase). As shown in Table 5-2, SCAG projects slower overall population growth rates for Orange County, including 7.77 percent population growth, but somewhat higher housing growth rate at 17.2 percent increase, and 11.9 percent job growth.

Table 5-2. SCAG Projections, City of Brea and Orange County

Description	2019	2050	Projected Change 2019–2050	Projected Percentage Change 2019–2050
Brea				
Population	46,900	54,585[1]	7,685	16.4%
Housing	17,100	19,900	2,800	16.3%
Employment	54,600	57,400	2,800	5.1%
Jobs-Housing Ratio	3.19	2.88	N/A	N/A
Orange County				
Population	3,191,000	3,439,000	248,000	7.77%
Housing	1,069,000	1,253,000	184,000	17.2%
Employment	1,805,000	2,019,000	214,000	11.9%

Source:. SCAG 2024.

Notes:

[1] Note that the Connect SoCal 2024 does not specifically state the 2050 population projection. Instead, it indicates that for Connect SoCal 2024, SCAG population projections below the County level are developed for required modeling purposes only, and a rough estimate of the future jurisdiction-level population based on Connect SoCal's household forecast can be derived using a County-level P:H ratio from Table 12 and applying it to a jurisdiction's future household growth. Therefore, a rough estimate has been extrapolated by applying a household P:H ratio of 2.774 to household growth of 2,800 housing units. 46,900 + 7,685 = 54,585 residents.

One of the primary purposes of a General Plan is to provide a long-term policy framework to accommodate future growth in a planned, coordinated manner. As shown in Table 5-3, Buildout Comparison of Existing and Proposed Project, full implementation of the Focused GPU would result in increases of 7,392 housing units (45.2 percent), 21,062 residents (45.2 percent), and 21,772 jobs (41.9 percent) relative to existing conditions. These projections represent conservative full buildout estimates to support the CEQA analysis. The currently adopted 2003 General Plan assumed a buildout horizon year of 2020; however, as shown, actual development during that period did not reach the plan's projected population levels.

Table 5-3. Buildout Comparison of Existing and Proposed Project

Description	Existing	2003 General Plan	Focused GPU	Net Difference Existing – Proposed	Net Difference 2003 General Plan – Proposed
Population	46,585	57,954	67,647	21,062 (45.2%)	9,693 (16.7%)
Housing Units	16,345	20,335	23,736	7,391 (45.2%)	3,401 (16.7%)
Jobs	51,937	68,624	73,709	21,772 (41.9%)	5,085 (7.4%)
Jobs-Housing Ratio	3.18	3.37	3.10	N/A	N/A

The Focused GPU anticipates a higher level of growth than SCAG's 2050 projection, as summarized in Table 5-4, Buildout Comparison of the Focused GPU to SCAG Projections. SCAG projects a total of 54,585 residents, 19,900 housing units, and 57,400 jobs by 2050, whereas the Focused GPU would accommodate up to 67,645 residents (13,060 more), 23,736 housing units (3,836 more), and 73,709 jobs (16,309 more). Although the City's General Plan buildout capacity exceeds SCAG's long-term growth forecast, this difference does not indicate that the Proposed Project would induce substantial unplanned population growth. SCAG's forecasts reflect expected regional growth based on economic and demographic trends, while the City's General Plan establishes the maximum development potential allowed under existing policies. The higher buildout capacity provides flexibility to accommodate potential future demand but does not ensure or directly cause such growth. Actual development will remain contingent upon market conditions, infrastructure availability, and subsequent project-level approvals. Therefore, the variation between the City's buildout capacity and SCAG's forecast reflects differing planning assumptions rather than evidence of growth inducement.

Table 5-4. Buildout Comparison of the Focused GPU to SCAG Projections

Description	SCAG 2050	Focused GPU	Net Difference
Population	54,585[1]	67,647	13,062 (23.9%)
Housing	19,900	23,736	3,836 (19.3%)
Employment	57,400	73,709	16,309 (28.4%)
Jobs-Housing Ratio	2.88	3.10	0.22 (7.6%)

Notes:

[1] Note that the Connect SoCal 2024 does not specifically state the 2050 population projection. Instead, it indicates that for Connect SoCal 2024, SCAG population projections below the County level are developed for required modeling purposes only, and a rough estimate of the future jurisdiction-level population based on Connect SoCal's household forecast can be derived using a County-level P:H ratio from Table 12 and applying it to a jurisdiction's future household growth. Therefore, a rough estimate has been extrapolated by applying a household P:H ratio of 2.774 to household growth of 2,800 housing units. 46,900 + 7,685 = 54,585 residents.

Implementation of the Focused GPU would facilitate both direct and indirect population and employment growth within the Project area; however, this growth is planned and intentional. The Focused GPU focuses higher-density development within the MU 50 and BCSP areas, which are already largely served by adequate infrastructure and public services. Concentrating new growth

within these mixed-use and transit-accessible areas would help minimize dispersed, unplanned development elsewhere in the City.

By directing future development to areas designated for higher intensity uses and supported by existing or planned infrastructure, the Focused GPU would not directly or indirectly result in substantial unplanned population growth. The Proposed Project would remain generally consistent with regional growth projections, slightly improve the City's jobs-housing balance (from 3.18 under existing conditions to 3.10 under the Focused GPU), and ensure that adequate services and infrastructure are provided to meet existing and future needs. Therefore, implementation of the Proposed Project would result in a less than significant impact with respect to population and employment growth under CEQA.

Threshold PH-b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Focused General Plan Update

Less than Significant Impact. The Housing Crisis Act of 2019 and its subsequent regulations (Senate Bill 330, Senate Bill 8, Assembly Bill 1218) impose protections on existing housing units when new housing or development projects propose demolishing or converting residential units. Any housing development project that demolishes or converts existing residential dwelling units must ensure no net loss of units, meaning the new project must include at least as many dwelling units as the greatest number present on the site within the last 5 years. Additionally, if any units are considered protected units (i.e., deed-restricted affordable, rent-controlled, occupied by low-income households, or withdrawn via the Ellis Act within relevant look-back periods), the project must replace those units with equivalent-sized replacement units offered at the same income and affordability level. These protections are intended to prevent reductions in housing supply and preserve affordability and tenant rights.

The planning period buildout projects 23,736 dwelling units in the Project area, representing an increase of 7,391 dwelling units compared to the existing 16,345 units, along with an increase of approximately 9.1 million square feet of non-residential area. Considering that each development project will be subject to the Housing Crisis Act and subsequent regulations, ensuring no net loss of units occurs, and that the Proposed Project would increase total housing and non-residential development within the Project area, the Proposed Project would not result in substantial displacement of existing residents or housing. This impact would be less than significant.

Brea Core Specific Plan

Less than Significant Impact. The BCSP area is developed with 1,417 existing dwelling units. The buildout of the BCSP would increase the total permitted housing units to 4,752 dwelling units, representing an increase of 3,335 units. Current non-residential square footage totals 5,113,863 square

feet, and buildout capacity would reach 6,379,588 square feet, an increase of approximately 1.27 million square feet. Therefore, the buildout of the BCSP would not result in the displacement of a substantial number of existing residents or housing. Furthermore, as with the rest of the City, each development project will be subject to the Housing Crisis Act and subsequent regulations to ensure that no net loss of units occurs. Therefore, the BCSP would result in a less than significant impact.

5.5 Recreation

Threshold REC-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?

Focused General Plan Update

Less than Significant Impact. Buildout of the Focused GPU would allow for the development of an additional 7,391 units in the Project area, which would result in an estimated population growth of up to 21,062 net new residents. This increase in population would increase the use of existing park and recreational facilities.

Brea has a goal of 5 acres per 1,000 population for public parks and recreational facilities. The City currently includes approximately 353.68 acres of park, including City-owned and non-City-owned parks (i.e., regional parks and school joint-use sites) as listed on Table 4.12-3, City of Brea Park Facilities, in Section 4.12, Public Services. Additionally, Chino Hills State Park, which abuts the City to the east, is about 14,000 acres, and there are numerous other recreational facilities, such as two golf courses, the Brea Sports Park, and the Olinda Oil Museum and Trail. In addition, the City provides an extensive, well-connected trail network that provides residents and visitors with opportunities for recreation, active transportation, and access to the community's natural open space areas. The system includes multi-use paths, natural-surface trails, and regional connections that link Brea to surrounding communities, including but not limited to The Tracks at Brea, a Citywide multi-use trail, extending approximately 4 miles east–west across the City from Arovista Park to Valencia Avenue.

Based on the current population of 46,585 residents in the City under existing conditions, the City currently has 7.6 acres per 1,000 population of public park without the Chino Hills State Park and other trails and recreational facilities serving Brea residents. With Focused GPU implementation, the parks acres per 1,000 population would be 5.2 acres. Although it would decrease from the current 7.6 acres, it still would be more than the City's goal of 5 acres per 1,000 population. Although this does not account for the additional park space to be provided pursuant to BCC Section 18.64.080, which establishes the subdivision regulations for the provision of park and recreational facilities through land dedication, installation of improvements, payment of in-lieu fee thereof, or a combination. BCC Section 18.64.080 requires the land dedication ratio of 5 acres per 1,000 population and sets the population density to be determined in accordance with the latest

Census of Population on Housing. Therefore, with implementation of the Focused GPU, while it would increase the use of existing neighborhood and regional parks or other recreational facilities, new development would be required to fund park development and improvements through the payment of park development fees, and adequate parks and recreation facilities would be provided. Impacts would be less than significant.

Brea Core Specific Plan

Less than Significant Impact. The BCSP currently includes one school join-use recreational facility—Lagos de Moreno Playground—adjacent to Laurel Elementary School. The playground is approximately 1.5 acres and includes a children's playground and open lawn area. Implementation of the BCSP would change the existing R-1 (Single Family Residential 5000) designation to P/R/OS-PR (Parks/Recreation/Open Space–Parks/Recreation), which reflects existing conditions as the area is already developed as part of The Tracks at Brea. The existing park and trail system would continue to serve the BCSP area and the broader Brea community. In addition, development under the BCSP would be required to comply with BCC Section 18.64.080. Therefore, impacts would be less than significant.

Threshold REC-b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Focused General Plan Update and Brea Core Specific Plan

Less than Significant Impact. Focused GPU and the BCSP implementation does not include specific recreational facilities development but would require the construction or expansion of recreational facilities in accordance with BCC Section 18.64.080, to serve the additional residents. While construction of such facilities at full buildout could result in physical effects on the environment, these impacts would be subject to existing Federal, State, and local regulations that mitigate potential adverse effects. The Proposed Project does not include any plans, policies, or programs that would alter existing requirements for parkland provision, and future park development would undergo separate environmental review under applicable regulations. Therefore, adverse physical effects on the environment are not anticipated, and impacts would be less than significant.

Chapter 6 Other CEQA Considerations

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Program Environmental Impact Report (PEIR) must identify the following five components:

- Significant environmental impacts of the Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project) (Section 15126.2[a] of the CEQA Guidelines; addressed in Chapter 4, Environmental Analysis; Section 4.1, Aesthetics, through Section 4.16, Wildfire).
- Energy impacts of the Proposed Project (Section 15126.2[b] of the CEQA Guidelines; addressed in Section 4.5, Energy).
- Significant environmental impacts that could not be avoided if the Proposed Project is implemented (Section 15126.2[c] of the CEQA Guidelines; addressed in Section 6.1, Significant and Unavoidable Environmental Impacts).
- Significant, irreversible environmental impacts that would result from the Proposed Project should it be implemented (Section 15126.2[d] of the CEQA Guidelines; addressed in Section 6.3, Significant and Irreversible Environmental Impacts).
- Growth-inducing impacts of the Proposed Project (Section 15126.2[e] of the CEQA Guidelines; addressed in Section 6.4, Growth-Inducing Impacts).

The last three of the listed five components are addressed in this chapter:

6.1 Significant and Unavoidable Environmental Impacts

Section 15126.2(c) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant impacts that could not be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the Proposed Project on various aspects of the environment are discussed in detail in Chapter 4 of this PEIR. Based on the analysis presented in this PEIR, the Proposed Project would create significant and unavoidable impacts related to:

- Air Quality,
- Greenhouse Gas Emissions, and
- Noise.

Refer to Section 4.2, Air Quality; Section 4.7, Greenhouse Gas Emissions; and Section 4.11, Noise, for a complete description of significant and unavoidable impacts to these environmental issue areas. All other significant impacts identified in Chapter 4 of this PEIR can be reduced to below a level of significance with implementation of the mitigation framework identified in Chapter 4 and

through compliance with applicable Federal, State, regional, and local plans, policies, and programs (PPPs).

Under CEQA Guidelines, Section 15065(c)(4), when an EIR demonstrates that a project will cause significant and unavoidable impacts that cannot be fully mitigated, the agency must issue a Statement of Overriding Considerations before approving the project. Under CEQA Guidelines, Section 15093, a Statement of Overriding Considerations is a report of the lead agency's findings regarding the merits of approving a project despite its significant environmental impacts and reflects the balancing of competing public objectives. Therefore, the City of Brea (City) would be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in Chapter 4.

6.2 Reasons the Project is Being Proposed Notwithstanding its Significant Unavoidable Impacts

In addition to identification of the Proposed Project's significant unavoidable impacts, Section 15126.2(c) of the CEQA Guidelines requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the Proposed Project. The reasons why the Proposed Project has been proposed are grounded in the underlying purpose of the Proposed Project. As discussed in Chapter 2, Project Description, of this PEIR, the underlying purpose of the Proposed Project is to comprehensively update the 2003 Brea General Plan to establish a long-range vision that reflects the unique needs of the City and provides clear direction to improve the quality of life for residents, businesses, and visitors. Thus, the Focused GPU and BCSP establish the long-range visions for the entire City and the BCSP area, and provide the goals, policies, and actions, which are steps to achieve the respective visions. The intent of Focused GPU is to guide the physical growth of the City over the next two decades through the stated goals and policies (refer to Appendix C, Brea 2050 General Plan: Goals, Policies, and Actions). The BCSP is also intended to provide a clear set of policies for development and improvements in the area over time.

As discussed above, the Proposed Project would result in significant and unavoidable impacts with respect to air quality, greenhouse gas (GHG) emissions, and noise. However, notwithstanding these significant and unavoidable environmental impacts, the Proposed Project is proposed to allow for the adoption and implementation of the Focused GPU for the City and its Sphere of Influence. The Focused GPU constitutes a comprehensive update to the City's existing 2003 Brea General Plan, ensuring its policies and programs align with current community needs, State mandates, and planning principles based on the General Plan Audit prepared in 2023. The BCSP would implement the values identified in 2017 Brea Envisions Community Strategic Plan and the goals, policies, and recommendations of the 2020 Brea Connecting the Core Active Transportation Plan, which would ultimately allow for the development of 4,752 residential units and

approximately 6,379,588 square feet of non-residential uses within the BCSP area, representing an increase of 3,335 residential units and approximately 1,265,725 square feet of non-residential uses compared to existing conditions (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR).

The Proposed Project would achieve the following benefits:

- Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision through its policies;
- Guide decision-making related to development, housing, transportation, environmental quality, public services, parks, open space, and environmental justice;
- Help the City achieve compliance with applicable State and regional policies, including housing production and environmental regulations;
- Allow City departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve environmental resources, and minimize hazards; and
- Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the zoning ordinance and future specific plans.

6.3 Significant and Irreversible Environmental Impacts

Section 15126.2(d) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be caused by the project should it be implemented. Specifically, the CEQA Guidelines state:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

In the case of the Proposed Project, implementation would cause the following significant irreversible changes:

The Proposed Project would allow for future development that would necessarily consume limited, slowly renewable and nonrenewable resources. This consumption would occur during the construction phase of individual projects allowed under the Proposed Project and would continue throughout their operational lifetime. Development of individual projects allowed under the Proposed Project would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and

people to and from the individual project sites. Construction of individual projects would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered nonrenewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from various project sites around the Project area.

Ongoing operation of individual projects facilitated under the Proposed Project would entail a further commitment of energy resources in the form of petroleum products, natural gas, electricity, and water. Long-term impacts would also result from an increase in vehicular traffic, and the associated air pollutant and noise emissions.

An increased commitment of social services and public maintenance services (e.g., police, fire, schools, libraries, and sewer and water services) would also be required. The energy and social service commitments would be long-term obligations in view of the low likelihood of returning the land to its original condition once it has been developed.

6.4 Growth-Inducing Impacts

As required by Section 15126.2(d) of the CEQA Guidelines, an EIR must discuss ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Additionally, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, the stimulation of economic activity in the region, or the establishment of policies or other precedents that directly or indirectly encourage additional growth. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment.

In general, a project could foster economic or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of new access to an area, or a change in zoning or General Plan Amendment approval) or economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base or employment expansion). These circumstances are further described below.

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide

additional information on ways in which the Proposed Project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this PEIR.

6.4.1 Population and Housing Growth

As discussed in Section 5.4, Effects Found Not to Be Significant, Population and Housing, of this PEIR, from 2000 to 2010 Brea's population increased by 10.9 percent and from 2010 to 2020 by 16.2 percent. According to the Southern California Association of Governments (SCAG), the city is projected to continue growing over the next two decades. SCAG's regional growth forecast estimates that Brea's population would increase from approximately 46,900 in 2019 to about 54,585 by 2050, representing a difference of 7,685 people, or a 16.4 percent increase.

Implementation of the Proposed Project would facilitate both direct and indirect population and employment growth within the Proposed Project area; however, this growth is planned and intentional. The Proposed Project focuses higher-density development within the Mixed Use 50 and BCSP areas, which are already largely served by adequate infrastructure and public services. Concentrating new growth within these mixed-use and transit-accessible areas would help minimize dispersed, unplanned development elsewhere in the City.

By directing future development to areas designated for higher intensity uses and supported by existing or planned infrastructure, the Proposed Project would not directly or indirectly result in substantial unplanned population growth.

Additionally, with regard to housing growth for the Proposed Project, the planning period buildout projects 23,736 dwelling units in the Project area, representing an increase of 7,391 dwelling units compared to the existing 16,345 units, along with an increase of approximately 9.1 million square feet of non-residential area. Considering that each development project will be subject to the Housing Crisis Act and subsequent regulations, ensuring no net loss of units occurs, and that the Proposed Project would increase total housing within the Project area. The BCSP area is currently developed with 1,417 existing dwelling units. The buildout of the BCSP would increase the total permitted housing units to 4,752 dwelling units, representing an increase of 3,335 units (refer to Table 2-2, Proposed Land Use Summary, in Chapter 2, Project Description, of this PEIR).

The Proposed Project would not be growth inducing or set new precedent for growth but would involve development in anticipation of expected growth in the City.

6.4.2 Elimination of Obstacles to Growth

Elimination of obstacles to growth refers to the extent to which a project removes infrastructure limitations or provides infrastructure capacity or removes regulatory constraints that could result in growth unforeseen at the time of project approval.

The elimination of either physical or regulatory obstacles to growth is considered a growth-inducing effect although not necessarily a significant one. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

The Proposed Project focuses higher-density development within the Mixed Use 50 and BCSP areas, which are already largely served by adequate infrastructure and public services. Development under the Proposed Project would occur for areas of the City that are developed and are served by an extensive network of roadways. To support growth, new water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications facilities would be constructed in the City based on the City's Water Master Plan, Sewer Master Plan, Master Plan of Drainages, and other applicable local, regional, and State regulatory standards. Pending and future projects would be required to analyze public utilities demand and supply to avoid conflicts and provide upgrades or pay development impact fees toward new infrastructure facilities, as needed. The majority of these new facilities would connect to existing systems. Since no new major roads or highways would be implemented to provide new access to the City, the Proposed Project would not facilitate development in any undeveloped areas where development could not already occur under existing City plans or ordinances. Therefore, the Proposed Project would not result in the removal of obstacles to growth that would result in growth-inducing development.

6.4.3 Economic Expansion or Growth

Economic effects refer to the extent to which a project could cause increased activity in the local or regional economy. Economic effects can include such effects as the "multiplier effect." A "multiplier" is an economic term used to describe interrelationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project and the indirect and induced employment growth. The multiplier effect acknowledges that the on-site employment and population growth of each project is not the complete picture of growth caused by the project.

Implementation of the Proposed Project would generate short-term employment opportunities during construction activities associated with future development. The Focused GPU and BCSP would not be considered growth inducing as future development allowed under the Proposed Project would draw from the existing supply of construction workers in the Southern California workforce. Implementation of the Focused GPU would facilitate both direct and indirect population and employment growth within the Project area; however, this growth is planned and intentional. Potential full-time and part-time positions are anticipated to be filled by the regional labor force. The jobs associated with the future development could attract new residents to the City; however, there is an existing employment base in the City, County of Orange, and in other

surrounding counties from which to pull employees without having to relocate. Furthermore, the economic expansion that would occur associated with future development is accounted for in the Focused GPU and BCSP and is anticipated by the City. Therefore, impacts related to employment growth are not considered growth inducing.

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Chapter 7 Alternatives

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe a reasonable range of alternatives to the proposed Brea 2050: Focused General Plan Update (Brea 2050 or Focused GPU) and Brea Core Specific Plan (BCSP) (together referred to as the Proposed Project or Project) that could feasibly attain most of the Project objectives while avoiding or considerably reducing any of the significant impacts of the Proposed Project. In addition, a "No Project" Alternative must be analyzed in the document. CEQA also requires that an environmentally superior alternative be identified from among the alternatives. The environmentally superior alternative is the alternative with the fewest or least severe adverse environmental impacts. When the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines, Section 15126.6[e][2]).

The CEQA Guidelines emphasize a common sense approach. The alternatives shall be reasonable, "foster informed decision making and public participation," and focus on alternatives that avoid or substantially lessen the significant impacts (CEQA Guidelines, Section 15126.6[a]). CEQA does not require that an EIR present the alternatives analysis in the same level of detail as the assessment of the Proposed Project, and does not require that every conceivable alternative to a project be considered.

To develop a reasonable range of alternatives to the Project, the City of Brea (City) considered:

- Project objectives
- Significant impacts of the Proposed Project
- Alternatives suggested during the scoping process
- Other alternatives considered

Through this process, the City identified two Project alternatives to be evaluated, in addition to the No Project Alternative required by CEQA.

This chapter includes a description of how the Project alternatives were developed, an evaluation of the alternatives in comparison to the Proposed Project, and identification of the environmentally superior alternative.

7.1 Summary of Impacts

A summary of the environmental impacts resulting from implementation of the Proposed Project, as disclosed in Chapter 4, Environmental Analysis, of this Program Environmental Impact Report (PEIR), is provided in Table 7-1, Summary of Environmental Impacts and Mitigation Measures.

Table 7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure (MM)	Level of Significance After Mitigation
Section 4.1, Aesthetics			
Threshold AE-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold AE-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold AE-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold AE-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.2, Air Quality			
Threshold AQ-a	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM AQ-1 is required.	Significant and unavoidable.
Threshold AQ-b	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM AQ-1 is required.	Significant and unavoidable.
Threshold AQ-c	Focused GPU and BCSP Less than significant.	Focused GPU and BCSP No mitigation measures are required.	Less than significant.
Threshold AQ-d	Focused GPU and BCSP Less than significant.	Focused GPU and BCSP No mitigation measures are required.	Less than significant.
Section 4.3, Biological Resources			
Threshold BIO-a	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM BIO-1 through MM BIO-7 are required	Less than significant.
Threshold BIO-b	Focused GPU Potentially significant. BCSP Less than significant.	Focused GPU MM BIO-1, MM BIO-3 through MM BIO-5 are required. BCSP No mitigation measures are required.	Less than significant.
Threshold BIO-c	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM BIO-1, MM BIO-8, and MM BIO-9 are required.	Less than significant.
Threshold BIO-d	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM BIO-1 and MM BIO-3 through MM BIO-6 are required.	Less than significant.

Table 7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure (MM)	Level of Significance After Mitigation
Threshold BIO-e	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM BIO-1 through MM BIO-9 are required.	Less than significant.
Threshold BIO-f	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.4, Cultural Resources			
Threshold CUL-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold CUL-b	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM CUL-1 through MM CUL-5 are required.	Less than significant.
Threshold CUL-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.5, Energy			
Threshold EN-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold EN-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.6, Geology and Soils			
Threshold GEO-f	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM GEO-1 is required.	Less than significant.
Section 4.7, Greenhouse Gas Emissions			
Threshold GHG-a	Focused General Plan Update Potentially significant. BCSP Potentially significant. (Cumulative Only)	Focused GPU and BCSP MM GHG-1	Significant and unavoidable.
Threshold GHG-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.8, Hazards and Hazardous Materials			
Threshold HAZ-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ-e	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.

Table 7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure (MM)	Level of Significance After Mitigation
Threshold HAZ-f	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HAZ-g	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.9, Hydrology and Water Quality			
Threshold HYD-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold HYD-e	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.10, Land Use and Planning			
Threshold LU-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold LU-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.11, Noise			
Threshold NOI-a	Focused GPU Potentially significant. BCSP Potentially significant (Cumulative Only).	Focused GPU and BCSP MM NOI-1 and MM NOI-2 are required.	Significant and unavoidable.
Threshold NOI-b	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM NOI-3 is required.	Less than significant.
Threshold NOI-c	Focused GPU and BCSP No impact.	No mitigation measures are required.	No impact.
Section 4.12, Public Services			
Threshold PS-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold PS-e	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.

Table 7-1. Summary of Environmental Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measure (MM)	Level of Significance After Mitigation
Section 4.13, Transportation			
Threshold TRA-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold TRA-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold TRA-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold TRA-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.14, Tribal Cultural Resources			
Threshold TCR-a	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM TCR-1 and MM TCR-2 are required.	Less than significant.
Section 4.15, Utilities and Service Systems			
Threshold UTL-a	Focused GPU and BCSP Potentially significant.	Focused GPU and BCSP MM UTL-1 is required.	Less than significant.
Threshold UTL-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold UTL-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold UTL-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold UTL-e	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Section 4.16, Wildfire			
Threshold WILD-a	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold WILD-b	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold WILD-c	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.
Threshold WILD-d	Focused GPU and BCSP Less than significant.	No mitigation measures are required.	Less than significant.

As shown in Table ES-1, Proposed Land Use Summary, the Proposed Project would result in significant and unavoidable impacts after mitigation to the following environmental issues:

7.1.1 Focused General Plan Update

- Air Quality
  - Threshold AQ-a: Conflict with or obstruct implementation of the applicable air quality plan.
  - Threshold AQ-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.
- Greenhouse Gas Emissions
  - Threshold GHG-a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Noise
  - Threshold NOI-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.

7.1.2 Brea Core Specific Plan

- Air Quality
  - Threshold AQ-a: Conflict with or obstruct implementation of the applicable air quality plan.
  - Threshold AQ-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.
- Greenhouse Gas Emissions
  - Threshold GHG-a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (This impact is individually less than significant but cumulatively significant.)
- Noise
  - Threshold NOI-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. (This impact is individually less than significant but cumulatively significant.)

7.2 Project Objectives

The process of identifying potential alternatives involves consideration of the objectives for the Proposed Project, which are described in Section 2.2, Project Objectives, in Chapter 2, Project Description, and restated below:

1. Preserve, protect, and enhance the City's small-town charm;
2. Continue to provide a community rich in amenities that meet the needs of current and future residents;
3. Accommodate a diverse range of housing development options and densities, ensuring that residents across income levels, age groups, and those with special needs can live within the community;
4. Advance economic development policies that support existing local businesses, attract new businesses, and promote job growth;
5. Encourage the long-term economic success of Downtown Brea and the community's corridors as mixed-use activity nodes;
6. Balance jobs and housing to create an economically sustainable community with reduced impacts on the City's transportation network;
7. Ensure new developments incorporate well-designed site planning, high-quality architecture, and functional outdoor spaces, while ensuring they are compatible with the surrounding setting in terms of land uses, scale, and aesthetics;
8. Preserve the natural environment, including open spaces, hillsides, and wildlife;
9. Maintain adequate, reliable, and essential public infrastructure and facilities, including transportation and utilities to support both existing and future development;
10. Maintain a Circulation Plan that fosters a safe and efficient roadway network by minimizing congestion and providing acceptable operation and level of service for vehicles at intersections and roadways;
11. Maintain and enhance the City's active transportation network to facilitate walking, bicycling, and public transit, improving multimodal connectivity throughout the City;
12. Provide for a wide range of housing opportunities in close proximity to existing and future employment centers and transportation facilities, consistent with the need identified in the City's 2021-2029 Housing Element and local and regional jobs/housing balance policies including Southern California Association of Governments' (SCAG's) Connect SoCal through regional programs such as the Sustainable Communities Program and related housing planning initiatives;
13. Support intensification and redevelopment within the Brea Core Area through implementation and adoption of the BCSP;

14. Provide a focused update to the 2003 Brea General Plan to comply with recent changes to State general plan and housing laws; and
15. Facilitate future use streamlining provisions allowed under CEQA by providing updated community-level environmental review.

7.3 Alternatives Considered but Rejected

The CEQA Guidelines state that an EIR should identify alternatives that were considered by the lead agency but were rejected, and should briefly state the reasons underlying the lead agency's determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is the failure to meet most of the basic project objectives or inability to avoid significant environmental effects (CEQA Guidelines, Section 15126.6[c]).

The following section describes alternatives or alternative concepts that were given consideration by the lead agency but rejected from further analysis in the EIR.

7.3.1 Alternative Development Areas Alternative

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In general, a location alternative that conflicts with jurisdictional boundaries or long-term infrastructure planning may be deemed infeasible, therefore, the Proposed Project considers the entire planning area for the City as the Project area. Furthermore, the Proposed Project involves policy documents and do not involve actual development projects. Therefore, in general, any development of the increased development intensity proposed by the Proposed Project would have substantially the same impacts on air quality, energy, greenhouse gas (GHG) emission, land use and planning, noise, and transportation. Without a site-specific analysis, impacts on aesthetics, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, public services, Tribal Cultural Resources, utilities and service systems, and wildfire would be speculative and cannot be fully evaluated. Further, the Proposed Project's significant and unavoidable impacts would not be reduced or eliminated by moving the Proposed Project to alternative sites. Overall, due to the lack of viable and comparable sites in the City that would allow development of the Proposed Project in a manner that would avoid or substantially lessen the Proposed Project's potentially significant impacts while achieving the majority of the Proposed Project's objectives, development of the Proposed Project on alternative sites has been eliminated from consideration.

7.4 Analysis of Project Alternatives Selected for Evaluation

The following alternatives are analyzed in this chapter:

- **Alternative 1:** No Project/ 2003 Brea General Plan Alternative
- **Alternative 2:** Proposed General Plan but No Brea Core Specific Plan Alternative
- **Alternative 3:** Reduced Intensity Alternative

These alternatives were determined to adequately represent the range of feasible alternatives required under CEQA for the Proposed Project. The No Project Alternative is included, as required by CEQA Guidelines, Section 15126.6(e). It would partially meet the basic Project objectives. Alternative 2 and Alternative 3 are potentially feasible options that could meet all of the lead agency's objectives, but not to the degree of the Proposed Project. Detailed descriptions of the alternatives are presented below, along with an evaluation of their environmental impacts.

7.4.1 Alternative 1: No Project/2003 Brea General Plan Alternative

The discussion of the No Project/2003 Brea General Plan Alternative must examine the existing conditions and reasonably foreseeable future conditions that would exist if the Proposed Project were not approved (CEQA Guidelines, Section 15126.6[e]). The Alternative 1: No Project Alternative/ 2003 Brea General Plan is defined as a continuation of existing conditions and conditions that are reasonably expected to occur in the event that the Proposed Project is not implemented. Under Alternative 1, the Proposed Project would not be adopted, and the land use intensity increases and comprehensive updates to the 2003 Brea General Plan and the BCSP would not occur. Instead, Alternative 1 assumes the buildout of the 2003 Brea General Plan in accordance with existing land use designations. Therefore, BCSP would not be adopted. As shown in Table 7-2, Alternative 1: No Project/2003 Brea General Plan Compared to the Proposed Project, this alternative would result in 20,335 housing units, and 57,954 population, 28,476,908 square feet of non-residential area, and 68,624 jobs, resulting in 3,401 fewer housing units (14.3 percent), 9,693 fewer residents (14.3 percent), 2,110,285 square feet of less non-residential area (7 percent), and 5,085 fewer jobs (7 percent) when compared to the Proposed Project.

Table 7-2. Alternative 1: No Project/2003 General Plan Compared to the Proposed Project

Description	Units	Population	NRSF	Jobs
Existing Conditions	16,345	46,585	21,480,414	51,937
Alternative 1: No Project/2003 Brea GP	20,335	57,954	28,476,908	68,624
Proposed Project	23,736	67,647	30,587,193	73,709
Difference: Proposed Project – Alternative 1	-3,401 (-14.3%)	-9,693 (-14.3%)	-2,110,285 (-7%)	-5,085 (-7%)

Notes: NRSF = non residential square footage; GP = General Plan

7.4.1.1 Impact Analysis

As documented in Chapter 4, Environmental Analysis, the PEIR analyzed potential environmental effects in the environmental issue areas described below. Therefore, the environmental analysis for Alternative 1 is also limited to these issue areas, where differences among alternatives could yield meaningful comparative analysis of environmental effects.

Aesthetics

As discussed in Section 4.1, Aesthetics, of this PEIR, the Proposed Project would result in less than significant impacts with regard to aesthetics.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. The 2003 Brea General Plan includes several policies that regulate scenic quality and resources. Future development under Alternative 1 would continue to be guided by the current General Plan Land Use Plan, and any future development would be consistent with existing City plans, policies, and regulations related to aesthetics. Therefore, impacts related to aesthetics—including scenic vistas, scenic resources within a State scenic highway, applicable regulations governing scenic quality, and light and glare—would remain less than significant, similar to the Proposed Project. However, benefits from the improved and updated goals and policies related to scenic vistas, hillside development, community design and placemaking, and natural open space pursuant to the Focused GPU and the BCSP would not occur, and the severity of these impacts would be less due to reduced growth under Alternative 1 compared to the Proposed Project.

Air Quality

As discussed in Section 4.2, Air Quality, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to air quality even with implementation of Mitigation Measure (MM) MM AQ-1.

Under Alternative 1, the construction and operation of individual development projects would also be required to follow existing State and local rules and regulations to minimize short-term and long-term emissions. The growth projections contained in Alternative 1 were included in the latest adopted Air Quality Management Plan (AQMP), and thus, future growth in the City is consistent with the 2003 Brea General Plan and would not conflict with the AQMP.

Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. This reduced development intensity would result in lower overall construction activity and total

construction emissions. However, maximum daily construction emissions of volatile organic compound (VOC) and NOx could still exceed South Coast Air Quality Management District (AQMD) thresholds. As shown in Table 4.2-7, Estimated Focused GPU Maximum Daily Construction Emissions (pounds/day) in Section 4.2, Air Quality, of this PEIR, the Proposed Project is estimated to exceed the VOC threshold by approximately 32 percent and the NOx threshold by approximately 13 percent. Assuming that Alternative 1 would result in an average land use intensity reduction of 10.5 percent (i.e., 14 percent residential + 7 percent non-residential reduction ÷ 2 = 10.5 percent), it can be reasonably assumed that South Coast AQMD VOC and NOx thresholds would still be exceeded. Therefore, as with the Proposed Project, construction-phase impacts would remain significant and require project-level mitigation (MM AQ-1).

With respect to long-term operational emissions, the Proposed Project would exceed South Coast AQMD thresholds for VOC and PM_{10} by approximately 36 percent and 52 percent (refer to Table 4.2-8, Net Change in Focused GPU Operational Emissions), respectively. However, there's no feasible mitigation to reduce operational impacts, therefore, would result in significant and unavoidable impacts. Similar to the construction impact analysis, although Alternative 1 would reduce the overall amount of residential and non-residential development relative to the Proposed Project, operational emissions from stationary and mobile sources would still be likely to exceed South Coast AQMD thresholds for VOC and PM_{10}. Accordingly, operational air quality impacts under Alternative 1 would remain significant and unavoidable, although the severity of impacts would be reduced compared to the Proposed Project.

With regard to toxic air contaminants (TACs), construction-related impacts under Alternative 1 would likely remain less than significant because construction activities would be temporary, intermittent, and not concentrated at a single location over extended periods. As discussed for the Proposed Project, continued implementation of California Air Resources Board (CARB) regulations—such as cleaner fuels, off-road diesel engine retrofits, and newer low-emission equipment—would further reduce diesel particulate matter (DPM) emissions over time. As with the Proposed Project, potential exposure of new sensitive receptors to TACs would require site-specific evaluation during future project-level review under the existing regulatory requirements as outlined in PPP AQ-2. Therefore, under Alternative 1, TAC-related impacts would be would be similar to the Proposed Project.

Alternative 1 would reduce overall construction and operational emissions compared to the Proposed Project but would still result in significant and unavoidable air quality impacts. Impacts would be less severe but not avoided.

Biological Resources

As discussed in Section 4.3, Biological Resources, of this PEIR, with the implementation of Mitigation Measures MM BIO-1 through MM BIO-8, the Proposed Project would result in less than significant impacts with regard to biological resources.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. Although this alternative would reduce overall development intensity Citywide, development intensity within areas designated Hillside Residential within the Sphere of Influence (SOI) would remain unchanged. Both the Proposed Project and Alternative 1 would allow up to 1,048 residential units within this land use designation. Unlike much of the incorporated City, which is largely developed, the Hillside Residential area remains largely undeveloped and therefore has the greatest potential to affect biological resources. Because Alternative 1 would not reduce development potential in this area, the types and locations of potential biological resource impacts would be similar to those associated with the Proposed Project.

As with the Proposed Project, the potential for future development under Alternative 1 to impact biological resources would be evaluated on a site-specific basis during individual project approval and environmental review, as required by CEQA. Future development would be subject to applicable discretionary permits and would be required to comply with all applicable Federal, State, and local regulations for the protection of biological resources. In addition, development under Alternative 1 would remain subject to the applicable biological resources mitigation measures identified in the 2003 Brea General Plan EIR. Therefore, impacts to biological resources under Alternative 1 would be less than significant, and similar in nature and severity to those of the Proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, of this PEIR, with the implementation of Mitigation Measures MM CUL-1 through MM CUL-4, the Proposed Project would result in less than significant impacts with regard to cultural resources.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. Cultural resources may be present in both developed and undeveloped areas of the City, and potential impacts would continue to be evaluated on a site-specific basis as individual development projects are proposed.

Although Alternative 1 would not eliminate the potential for impacts to cultural resources, the reduced overall development intensity would likely result in less demolition and fewer ground-disturbing activities compared to the Proposed Project. As a result, Alternative 1 would reduce the overall potential for impacts to cultural resources relative to the Proposed Project.

As with the Proposed Project, future development under Alternative 1 would be subject to applicable discretionary permits and would be required to comply with all applicable Federal, State, and local laws and regulations for the protection of cultural resources. In addition, development under Alternative 1 would remain subject to the cultural resources mitigation measures identified in the 2003 Brea General Plan EIR.

Therefore, impacts to cultural resources under Alternative 1 would be less than significant with compliance with applicable regulatory requirements and mitigation measures. While the significance determination would remain, the overall severity of potential impacts under Alternative 1 would be reduced compared to the Proposed Project.

Energy

As discussed in Section 4.5, Energy, of this PEIR, the Proposed Project would result in less than significant impacts with regard to energy.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. As with the Proposed Project, individual development projects under Alternative 1 would be required to comply with applicable State regulatory requirements, as outlined in Section 4.5, Energy, to avoid wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation. In addition, development under Alternative 1 would be required to comply with applicable building standards, including the California Building Energy Efficiency Standards (Title 24) and California Green Building Standards Code (CALGreen). Future development under Alternative 1 would remain subject to existing and future energy efficiency regulations, and because overall development intensity would be lower than under the Proposed Project, lower energy consumption is anticipated, and energy impacts under Alternative 1 would be less than those identified for the Proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, of this PEIR, the Proposed Project with implementation of mitigation measure MM GEO-1 (related to paleontological resources) impacts with regard to geology and soils would be less than significant.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. As a result, the overall extent of grading, excavation, and other ground-disturbing activities would be reduced relative to the Proposed Project.

However, similar to the Proposed Project, development under Alternative 1 could involve grading and excavation in areas underlain by geologic units with the potential to contain paleontological resources, including previously undeveloped areas or areas requiring deeper excavation associated with redevelopment. Because the presence or absence of paleontological resources cannot be determined without site-specific geologic investigations and knowledge of project-level construction depths, the potential for inadvertent discovery and disturbance of paleontological resources during future development under Alternative 1 remains.

As with the Proposed Project, adoption of Alternative 1 would not, by itself, result in physical ground disturbance. Potential impacts to paleontological resources would occur only as a result of future development projects and would be evaluated on a site-specific basis during individual project review. Future development under Alternative 1 would be subject to applicable discretionary approvals and would be required to comply with all applicable Federal, State, and local regulations related to paleontological resource protection. In addition, development facilitated by Alternative 1 would remain subject to implementation of mitigation measure related to paleontological resources contained in the 2003 Brea General Plan EIR 1, which requires studies to document the presence/absence of paleontological resources and to provide a detailed mitigation plan to address inadvertent discovery of paleontological resources during ground-disturbing activities.

Therefore, impacts to paleontological resources under Alternative 1 would be less than significant with compliance with applicable regulatory requirements and a mitigation measure. While the significance determination would remain, the overall severity of potential impacts under Alternative 1 would be reduced compared to the Proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to greenhouse gas emissions even with implementation of mitigation measure MM GHG-1.

Under Alternative 1 (No Project/ 2003 Brea General Plan), the Proposed Project would not be adopted, and future development would occur pursuant to the land use designations and development potential of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would result in approximately 14.3 percent fewer housing units and residents, and approximately seven percent fewer jobs and non-residential development at buildout.

Because Alternative 1 would accommodate less overall development than the Proposed Project, both construction- and operation-related GHG emissions would be reduced in comparison. Construction activity would be less intensive, and long-term operational emissions associated with mobile sources, electricity and natural gas consumption, water and wastewater conveyance, and solid waste generation would be proportionally lower.

However, similar to the Proposed Project, growth under Alternative 1 would still result in a net increase in GHG emissions relative to existing conditions. As shown in Table 4.7-4, Estimated Focused GPU Greenhouse Gas Emissions, in Section 4.7, Greenhouse Gas Emission, of this PEIR, the Proposed Project is estimated to result in additional 10,607 metric ton (MT) carbon dioxide equivalent (CO_2e) per year, exceeding the South Coast AQMD bright-line threshold of 3,000 MT CO_2e per year by 7,607 MT CO_2e or 254 percent. Therefore, an average reduction of development intensity by approximately 10.5 percent is not expected to reduce GHG impacts to less than the threshold level. As with the Proposed Project, the largest source of GHG emissions would continue to be mobile emissions, followed by emissions associated with energy consumption. Although per-capita vehicle miles traveled (VMT) would not be expected to increase substantially, overall emissions would increase due to growth. Accordingly, GHG emissions under Alternative 1 would still be expected to exceed the South Coast AQMD bright-line threshold and impacts would remain significant and unavoidable.

As with the Proposed Project, future development under Alternative 1 would be required to comply with applicable State and regional regulations and programs aimed at reducing GHG emissions, including implementation of measures identified in the 2022 CARB Scoping Plan, CALGreen, Building Energy Efficiency Standards, and vehicle emissions standards. Over time, these regulatory programs are expected to reduce emissions through transportation electrification, increased energy efficiency, and decarbonization of the electricity supply.

Although Alternative 1 does not include the Focused GPU or BCSP policies that encourage compact, transit-oriented development, growth under the 2003 Brea General Plan would still occur within an

urbanized area served by existing transportation infrastructure and would not preclude implementation of State or regional GHG reduction strategies. Development under Alternative 1 would continue to be subject to applicable regulations that support reductions in per-capita GHG emissions. Therefore, it is anticipated that projects to occur under Alternative 1 would also not conflict with the 2022 CARB Scoping Plan, SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy, or other applicable GHG reduction plans or policies. Impacts under Alternative 1 would be similar to the Proposed Project, and would remain less than significant.

Alternative 1 would reduce the overall magnitude of GHG emissions compared to the Proposed Project due to reduced residential and non-residential development; however, GHG emissions would still exceed the applicable South Coast AQMD significance threshold. Therefore, GHG impacts under Alternative 1 would remain significant and unavoidable, though less severe than those associated with the Proposed Project.

Hazards and Hazardous Materials

As discussed in Section 4.8, Hazards and Hazardous Materials, of this PEIR, the Proposed Project would result in less than significant impacts with regard to hazards and hazardous materials.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. As with the Proposed Project, potential hazards and hazardous materials conditions associated with future development would be evaluated on a site-specific basis during individual project review. Development facilitated by Alternative 1 would continue to be subject to all applicable Federal, State, and local laws and regulations governing the transport, use, handling, storage, and disposal of hazardous materials, as described in Section 4.8. Compliance with these requirements would ensure that impacts related to hazardous materials management would remain less than significant under Alternative 1, similar to the Proposed Project.

Future development under Alternative 1 would also be required to comply with applicable regulations related to hazardous emissions near sensitive receptors, including schools, and would not result in the routine handling or release of hazardous or acutely hazardous materials in a manner that would pose a significant risk to the public; required to comply with applicable regulations for sites listed pursuant to California Government Code, Section 65962.5, including requirements for site investigation, remediation, and safe reuse; demonstrate consistency with applicable emergency response and evacuation plans during the project approval and environmental review process; and comply with applicable building and fire codes and would be subject to review by the Brea Fire Department. Therefore, with compliance with applicable regulatory requirements, discretionary permit conditions, and 2003 Brea General Plan EIR mitigation measures, impacts related to hazards and hazardous materials under Alternative 1 would be less than significant. Although

Alternative 1 would reduce the overall development intensity compared to the Proposed Project, the nature and significance of hazards-related impacts would be similar, with a slight reduction in impact severity due to reduced development.

Hydrology and Water Quality

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. As with the Proposed Project, the potential for future development to affect surface water quality, groundwater quality, groundwater supplies or recharge, or to conflict with applicable surface- and groundwater plans would depend on the specific characteristics and locations of individual development projects.

Potential hydrology and water quality impacts under Alternative 1 would be evaluated on a site-specific basis during individual project approval and environmental review, as required by CEQA. Future development could occur in both developed and undeveloped areas; however, all projects would be required to comply with applicable Federal, State, and local regulations, including the National Pollutant Discharge Elimination System (NPDES) permit and Brea City Code (BCC) requirements, as outlined in Section 4.9, Hydrology and Water Quality. Compliance with these requirements, along with implementation of standard erosion control measures, stormwater best management practices, and other applicable mitigation measures, would minimize the potential for adverse effects on hydrology and water quality.

Accordingly, impacts related to water quality, groundwater supplies and recharge, and consistency with applicable surface- and groundwater management plans under Alternative 1 would be less than significant. Although Alternative 1 would reduce overall development intensity compared to the Proposed Project, the nature and significance of hydrology and water quality impacts would be similar, with a modest reduction in impact severity due to reduced development.

Land Use and Planning

As discussed in Section 4.10, Land Use and Planning, of this PEIR, the Proposed Project would result in less than significant impacts with regard to land use and planning.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. No changes to the currently adopted 2003 Brea General Plan would occur; as a policy document, the General Plan would not physically divide an established community. In addition, because no updates to the 2003 Brea General Plan would occur, the recommendations contained in the 2023 General Plan Audit—including updates needed

to comply with recent changes to State general plan and housing laws—would not be implemented. The 2003 Brea General Plan does not integrate land use, housing, and transportation planning to the same degree as the Proposed Project, including alignment with the goals and policies of the SCAG 2020–2045 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, impacts under Alternative 1 would be greater compared to the Proposed Project.

Noise

As discussed in Section 4.11, Noise, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to noise even with implementation of mitigation measure MM NOI-1 through MM NOI-4.

Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. This reduced development intensity would result in lower overall construction and operational noise and vibration. However, as with the Proposed Project, construction of future development allowed under Alternative 1 could also result in noise levels that could exceed significance thresholds, even with mandatory compliance with BCC requirements. Therefore, for discretionary projects requiring CEQA review, implementation of PPP NOI-1 and PPP NOI-4, and mitigation measures (MM NOI-1 through MM NOI-3), in addition to BCC compliance, would help to reduce the potentially significant construction- and operational-related noise impacts.

Although future development would be consistent with the existing land use and zoning designations, future projects' potential to generate excessive noise levels during construction and operation would be dependent on the construction and operation characteristics of individual projects and individual project sites. Noise impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. If development projects can demonstrate compliance with the City's established noise thresholds, with or without mitigation measures incorporated, then impacts related to noise would be considered less than significant. However, since the timing, intensity, surrounding uses, and design of future development permitted under Alternative 1 is unknown at this time, it would be speculative to assume that all future projects under Alternative 1 would be able to reduce their noise and vibration levels below established thresholds during construction and operation, even with mitigation measures incorporated. Therefore, noise impacts would remain significant and unavoidable. As with the Proposed Project, Alternative 1 is anticipated to reduce vibration-related impacts to a less than significant level with implementation of PPP NOI-5 and MM BIO-4, and no significant and unavoidable impact would remain.

Alternative 1 would reduce the overall magnitude of noise and vibration impacts compared to the Proposed Project due to reduced residential and non-residential development; however, without

site-specific information and analysis, it cannot be determined that impacts can be reduced to less than significant level at this time. Therefore, noise impacts under Alternative 1 would remain significant and unavoidable, though less severe than those associated with the Proposed Project.

Public Services

As discussed in Section 4.12, Public Services, of this PEIR, the Proposed Project would result in less than significant impacts with regard to public services.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. As a result, overall demand for public services under Alternative 1 would be lower than under the Proposed Project.

With respect to fire and police protection services, reduced growth under Alternative 1 would result in lower demand for emergency response services. If new or expanded fire or police facilities were required to serve development under Alternative 1, such facilities would be subject to separate environmental review and applicable mitigation requirements to address any potential physical impacts. Accordingly, impacts related to fire and police services would remain less than significant, similar to the Proposed Project, with reduced impact severity due to lower service demand.

Regarding schools, reduced residential development under Alternative 1 would generate fewer students compared to the Proposed Project. As with the Proposed Project, impacts on school facilities would be addressed through compliance with applicable regulations, including payment of statutory school impact fees, which are deemed to fully mitigate the impacts of development on school facilities under CEQA. Therefore, impacts related to schools would remain less than significant, with reduced severity compared to the Proposed Project.

Demand for parks, recreational facilities, and other public facilities, such as libraries, would also be lower under Alternative 1 due to reduced population and employment growth. If new or expanded facilities were required, their development would be subject to environmental review and the implementation of appropriate mitigation measures to minimize physical impacts. Consequently, impacts related to parks, recreation, and other public facilities would remain less than significant, similar to the Proposed Project, with a reduction in impact severity attributable to reduced development.

With compliance with applicable regulatory requirements and project-level environmental review, impacts to public services under Alternative 1 would be less than significant. While the significance conclusions would remain the same as for the Proposed Project, the overall severity of public services impacts under Alternative 1 would be reduced due to reduced development intensity.

Transportation

As discussed in Section 4.13, Transportation, of this PEIR, the Proposed Project would result in less than significant impacts with regard to transportation.

Under Alternative 1, no new Mobility Element or associated goals, policies, and actions supporting regional circulation, local circulation, complete streets, and pedestrian and bicycle facilities would be provided. Therefore, Alternative 1 would not achieve the same benefits as the Proposed Project. Additionally, the Proposed Project is projected to result in vehicle miles traveled (VMT) per service population that is lower than the 2003 Brea General Plan buildout VMT per service population. Accordingly, Alternative 1 is projected to result in greater VMT impacts compared to the Proposed Project.

Tribal Cultural Resources

As discussed in Section 4.14, Tribal Cultural Resources, of this PEIR, with implementation of MM TCR-1, the Proposed Project would result in less than significant impacts with regard to Tribal Cultural Resources.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. As a result, the overall extent of grading, excavation, and other ground-disturbing activities would be reduced relative to the Proposed Project, thereby reducing the potential for impacts to Tribal Cultural Resources. As with the Proposed Project, future development under Alternative 1 would be subject to the requirements of Senate Bill 18 and Assembly Bill 52, as applicable, including Tribal consultation during the project review process. These requirements ensure that Tribal Cultural Resources are appropriately identified and that measures are implemented to avoid, minimize, or mitigate potential impacts.

Therefore, impacts related to Tribal Cultural Resources under Alternative 1 would remain less than significant. While the significance determination would be the same as for the Proposed Project, the overall severity of potential impacts would be reduced due to the lower development intensity associated with Alternative 1.

Utilities and Service Systems

As discussed in Section 4.15, Utilities and Service Systems, of this PEIR, with implementation of MM UTL-1, the Proposed Project would result in less than significant impacts with regard to utilities and service systems.

Under Alternative 1, future development would occur pursuant to the land use designations and zoning regulations of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative

1 would result in approximately 3,401 fewer dwelling units and approximately 2.1 million square feet less non-residential development. As a result, demand for water supply, wastewater treatment, solid waste disposal, electricity, natural gas, and telecommunications services would be lower than under the Proposed Project.

Reduced development intensity under Alternative 1 would also result in fewer impervious surfaces Citywide and, therefore, reduced stormwater runoff volumes compared to the Proposed Project. Although Alternative 1 would reduce overall development intensity, development potential within areas designated Hillside Residential within the SOI would remain unchanged, and both the Proposed Project and Alternative 1 would allow up to 1,048 residential units within this designation. Because the remainder of the Project area is largely developed and served by existing wet and dry utility infrastructure, utilities-related impacts under Alternative 1 would be similar in nature to those of the Proposed Project.

As with the Proposed Project, future development under Alternative 1 would be required to comply with applicable State, regional, and local regulations, including CALGreen, California Building Energy Efficiency Standards, NPDES permit requirements, and BCC provisions. In addition, development under Alternative 1 would be required to provide infrastructure improvements consistent with the City's adopted Water Master Plan, Sewer Master Plan, and Master Plan of Drainages. No mitigation measure would be required under Alternative 1, and the overall severity of impacts would be reduced due to the lower development intensity associated with Alternative 1 compared to the Proposed Project.

Wildfire

As discussed in Section 4.16, Wildfire, of this PEIR, Proposed Project would result in less than significant impacts with regard to wildfire.

Compared to the Proposed Project, Alternative 1 would reduce residential development by approximately 14 percent and non-residential development by approximately seven percent. This alternative would reduce overall development intensity Citywide, however, development intensity within areas designated Hillside Residential within the SOI would not change. The entire SOI portion of the Project area is within the State Responsibility Area's Very High Fire Hazard Severity Zone (FHSZ). Both the Proposed Project and Alternative 1 would allow up to 1,048 residential units within this land use designation. Since Alternative 1 would not reduce development potential in this area, this alternative is not anticipated to substantially lessen wildfire impacts within the Project area.

Furthermore, future projects' potential for wildfire would be determined on a site-by-site basis and would be evaluated during their individual approval and or/environmental review process in accordance with CEQA, as applicable. As with the Proposed Project, development under this

alternative would be required to comply with the California Fire Code, California Building Code, Public Resources Code and the City of Brea's standards for fire protection, including providing fuel modification zones and implementing noncombustible construction and plants and landscaping, consistent with the Brea Hillside Zoning Ordinance and the Brea Fire Department Fuel Modification Guideline. Therefore, impacts would be less than significant, similar in nature and severity to those of the Proposed Project.

7.4.1.2 Ability to Meet Project Objectives

Alternative 1 would continue implementation of the 2003 Brea General Plan and would not adopt the Focused GPU and BCSP. As a result, Alternative 1 would not fully achieve the Project objectives, including the following:

- Accommodate a diverse range of housing development options and densities, ensuring that residents across income levels, age groups, and those with special needs can live within the community.
- Advance economic development policies that support existing local businesses, attract new businesses, and promote job growth.
- Encourage the long-term economic success of Downtown Brea and the community's corridors as mixed-use activity nodes.
- Provide for a wide range of housing opportunities in close proximity to existing and future employment centers and transportation facilities, consistent with the need identified in the City's 2021-2029 Housing Element and local and regional jobs/housing balance policies including SCAG's Connect SoCal through regional programs such as the Sustainable Communities Program and related housing planning initiatives.
- Support intensification and redevelopment within the Brea Core Area through implementation and adoption of the BCSP.
- Provide a focused update to the 2003 Brea General Plan to comply with recent changes to State general plan and housing laws.
- Facilitate future use streamlining provisions allowed under the California Environmental Quality Act (CEQA) by providing updated community-level environmental review.

7.4.1.3 Ability to Reduce the Project Impacts

Alternative 1 would not eliminate the significant and unavoidable impacts that would occur with the Proposed Project. Additionally, the following environmental issue areas would be greater with Alternative 1 when compared to the Proposed Project:

- Land Use and Planning
- Transportation

Alternative 1 would result in reduced impacts for the following environmental topic area when compared to the Proposed Project:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleo Only)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Tribal Cultural Resources
- Utilities and Service Systems

Alternative 1 would result in similar impacts to the Proposed Project in the following environmental topic areas:

- Biological Resources
- Wildfire

7.4.2 Alternative 2: Proposed General Plan but No Brea Core Specific Plan Alternative

The Alternative 2: Proposed General Plan but No Brea Core Specific Plan Alternative would eliminate the BCSP project from the Proposed Project. Under Alternative 2, the Focused GPU would be adopted but the land use increased proposed under BCSP would not be included. Instead, the units under the current 2003 Brea General Plan would be assumed within the BCSP area. The proposed goals, policies, and actions of the Focused GPU would not change and be implemented, but none of the BCSP goals and policies would be implemented.

As shown in Table 7-3, Alternative 2: Proposed GP But No BCSP Compared to the Proposed Project, this alternative would result in 21,445 housing units (net decrease of 2,291 housing units), and 61,118 population (net decrease of 6,529 residents), 30,295,247 square feet of non-residential (net decrease of 291,946 square feet), and 73,005 jobs (net decrease of 704 jobs) compared to the Proposed Project. The purpose of this alternative is to potentially reduce the severity of potential impacts to air quality, GHG emissions, and noise, as overall development of residential and non-residential would be less than what could be developed with the Proposed Project.

Table 7-3. Alternative 2: Proposed GP But No BCSP Compared to the Proposed Project

	Units	Population	NRSF	Jobs
Alternative 2: Proposed GP But No BCSP	21,445	61,118	30,295,247	73,005
Proposed Project	23,736	67,647	30,587,193	73,709
Difference: Proposed – Alternative 2	-2,291 (-9.7%)	-6,529 (9.7%)	-291,946 (-1%)	-704 (-1%)

Notes: GP = General Plan; BCSP = Brea Core Specific Plan; NRSF = non residential square footage

7.4.2.1 Impact Analysis

As documented in Chapter 4, Environmental Analysis, the PEIR analyzed potential environmental effects in the environmental issue areas described below. Therefore, the environmental analysis for Alternative 2 is also limited to these issue areas, where differences among alternatives could yield meaningful comparative analysis of environmental effects.

Aesthetics

As discussed in Section 4.1, Aesthetics, of this PEIR, the Proposed Project would result in less than significant impacts with regard to aesthetics.

Under Alternative 2, the Focused GPU would be adopted; however, the BCSP would not be implemented. Compared to the Proposed Project, Alternative 2 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment. Under this alternative, benefits from the improved and updated goals and policies related to scenic vistas, hillside development, community design and placemaking, and natural open space pursuant to the Focused GPU would occur, and a reduction in development intensity would likely to be have a reduced impacts related to aesthetics, including scenic vistas, scenic resources within a State scenic highway, applicable regulations governing scenic quality, and light and glare. The added benefits from mobility and beautification from the BCSP would not occur under Alternative 2, including coordinated streetscape improvements. Although impacts would remain less than significant, similar to the Proposed Project, the severity of these impacts would be lower due to reduced growth under Alternative 2 compared to the Proposed Project.

Air Quality

As discussed in Section 4.2, Air Quality, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to air quality even with implementation of Mitigation Measure MM AQ-1.

Under Alternative 2, the Focused GPU would be adopted; however, the BCSP would not be implemented. Development within the BCSP area would instead be assumed to occur consistent

with the land use designations and development potential of the 2003 Brea General Plan. The goals, policies, and actions of the Focused GPU would remain unchanged, and future development would continue to be subject to applicable Federal, State, and local air quality regulations. Growth projections from local general plans adopted by cities in the district are provided to SCAG, which develops regional growth forecasts that are then used to develop future air quality forecasts for the AQMP. Typically, development consistent with a local adopted General Plan is considered to be consistent with the AQMP. Alternative 2 would accommodate growth within the Project area beyond the adopted 2003 Brea General Plan. Therefore, as with the Proposed Project, growth under Alternative 2 would not be consistent with the assumptions used in the applicable AQMP and would conflict with AQMP implementation.

Compared to the Proposed Project, Alternative 2 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment. This slight reduction in overall development intensity would result in lower total construction activity and associated construction emissions compared to the Proposed Project. However, maximum daily construction emissions of VOC and NOx could still exceed South Coast AQMD thresholds, and construction-phase air quality impacts would remain significant, requiring project-level mitigation (MM AQ-1). Although implementation of MM AQ-1 would reduce construction air quality impacts, it cannot be demonstrated in a program level that impacts would be reduced to a less than significant level under Alternative 2, therefore, construction air quality impacts would remain significant and unavoidable.

With respect to operations, Alternative 2 would generate slightly fewer long-term emissions than the Proposed Project due to reduced residential and non-residential development. Therefore, operational emissions from stationary and mobile sources would still likely exceed South Coast AQMD thresholds for VOC and PM_{10}. Accordingly, operational air quality impacts under Alternative 2 would remain significant and unavoidable. As with the Proposed Project, there's no feasible mitigation measure to reduce operational air quality impacts under Alternative 2.

Regarding TACs, as with the Proposed Project, construction activities under Alternative 2 would be temporary, intermittent, and not concentrated at a single location over extended periods; therefore, construction-related impacts under Alternative 2 would likely remain less than significant. Furthermore, as discussed for the Proposed Project, continued implementation of CARB regulations—such as cleaner fuels, off-road diesel engine retrofits, and newer low-emission equipment—would further reduce DPM emissions over time. As with the Proposed Project, potential exposure of new sensitive receptors to TACs would require site-specific evaluation as outlined in PPP AQ-2, therefore, as with the Proposed Project, TAC-related impacts would be less than significant.

Alternative 2 would reduce overall construction and operational emissions compared to the Proposed Project but would still result in significant and unavoidable air quality impacts. Impacts would be less severe but not avoided.

Biological Resources

As discussed in Section 4.3, Biological Resources, of this PEIR, with the implementation of Mitigation Measures MM BIO-1 through MM BIO-8, the Proposed Project would result in less than significant impacts with regard to biological resources.

Under Alternative 2, the Focused GPU would be adopted; however, the BCSP would not be implemented. Development within the BCSP area would instead be assumed to occur consistent with the land use designations and development potential of the 2003 Brea General Plan. Compared to the Proposed Project, Alternative 2 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment.

Since this alternative would only reduce development intensity within the BCSP area, development intensity within areas designated Hillside Residential within the SOI would remain unchanged. Both the Proposed Project and Alternative 2 would allow up to 1,048 residential units within this land use designation.

Unlike much of the incorporated City, which is largely developed, the Hillside Residential area remains largely undeveloped and therefore has the greatest potential to affect biological resources. Because Alternative 2 would not reduce development potential in this area, the types and locations of potential biological resource impacts would be similar to those associated with the Proposed Project. Furthermore, the BCSP area is mostly composed of disturbed and urban/developed land, except for small areas identified as agriculture, disturbed, and annual grassland as shown on Figure 4.3-2, Vegetation Communities and Land Cover Types. However, areas to be disturbed and developed under the Proposed Project and Alternative 2 would be the same, therefore, impacts to biological resources would be the same.

As with the Proposed Project, the potential for future development under Alternative 2 to impact biological resources would be evaluated on a site-specific basis during individual project approval and environmental review, as required by CEQA. Future development would be subject to applicable discretionary permits and would be required to comply with all applicable Federal, State, and local regulations for the protection of biological resources. Therefore, impacts to biological resources under Alternative 2 would be less than significant, and similar in nature and severity to those of the Proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, of this PEIR, with the implementation of Mitigation Measures MM CUL-1 through MM CUL-4, the Proposed Project would result in less than significant impacts with regard to cultural resources.

Compared to the Proposed Project, Alternative 2 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment. Cultural resources (historical, archaeological, and human remains) may be present in both developed and undeveloped areas of the City, and potential impacts would need to be evaluated on a site-specific basis as individual development projects are proposed. There are 11 registered historical resources within the BCSP area, and even without the BCSP, the Project area would still have the potential to be developed but with less development intensity. Therefore, although Alternative 2 would not eliminate the potential for impacts to cultural resources, the reduced overall development intensity would likely result in less demolition and fewer ground-disturbing activities compared to the Proposed Project. As a result, Alternative 2 would reduce the overall potential for impacts to cultural resources relative to the Proposed Project.

As with the Proposed Project, future development under Alternative 2 would be subject to applicable discretionary permits and would be required to comply with all applicable Federal, State, and local laws and regulations for the protection of cultural resources. In addition, development under Alternative 2 would remain subject to the cultural resources mitigation measures identified in this PEIR.

Therefore, impacts to cultural resources under Alternative 2 would be less than significant with compliance with applicable regulatory requirements and mitigation measures. While the significance determination would remain the same as for the Proposed Project, the overall severity of potential impacts under Alternative 2 would be reduced.

Energy

As discussed in Section 4.5, Energy, of this PEIR, the Proposed Project would result in less than significant impacts with regard to energy.

Compared to the Proposed Project, Alternative 2 would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. As with the Proposed Project, individual development projects under Alternative w would be required to comply with applicable State regulatory requirements, as outlined in Section 4.5, Energy, to avoid wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation. In addition, development under Alternative 2 would be required to comply with applicable building standards, including the California Building Energy Efficiency Standards (Title 24) and CALGreen. Future development under Alternative 2

would remain subject to existing and future energy efficiency regulations, and because overall development intensity would be lower than under the Proposed Project, lower energy consumption is anticipated, and energy impacts under Alternative 2 would be less than those identified for the Proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, of this PEIR, the Proposed Project with implementation of mitigation measure MM GEO-1 (related to paleontological resources) impacts with regard to geology and soils would be less than significant.

Compared to the Proposed Project, Alternative 2 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment. As a result, the overall extent of grading, excavation, and other ground-disturbing activities would be reduced relative to the Proposed Project.

However, similar to the Proposed Project, development under Alternative 2 could involve grading and excavation in areas underlain by geologic units with the potential to contain paleontological resources, including previously undeveloped areas or areas requiring deeper excavation associated with redevelopment. Because the presence or absence of paleontological resources cannot be determined without site-specific geologic investigations and knowledge of project-level construction depths, the potential for inadvertent discovery and disturbance of paleontological resources during future development under Alternative 2 remains.

As with the Proposed Project, adoption of Alternative 2 would not, by itself, result in physical ground disturbance. Potential impacts to paleontological resources would occur only as a result of future development projects and would be evaluated on a site-specific basis during individual project review. Future development under Alternative 2 would be subject to applicable discretionary approvals and would be required to comply with all applicable Federal, State, and local regulations related to paleontological resource protection. In addition, development facilitated by Alternative 2 would remain subject to implementation of MM GEO-1, which requires a site-specific evaluation to determine whether ground-disturbing activities could occur and to provide appropriate mitigation measure. Therefore, impacts to paleontological resources under Alternative 2 would be less than significant with compliance with applicable regulatory requirements and MM GEO-2. While the significance determination would remain the same as for the Proposed Project, the overall severity of potential impacts under Alternative 2 would be reduced.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to greenhouse gas emissions even with implementation of mitigation measure MM GHG-1.

Compared to the Proposed Project, Alternative 2 would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. This reduction in development intensity would result in lower overall construction activity and correspondingly lower construction-related GHG emissions relative to the Proposed Project.

With respect to operations, Alternative 2 would generate fewer long-term GHG emissions from mobile sources, energy consumption, water and wastewater conveyance, and solid waste generation compared to the Proposed Project. However, similar to the Proposed Project, growth under Alternative 2 would still result in a net increase in GHG emissions relative to existing conditions. Mobile source emissions would continue to represent the largest contributor to overall GHG emissions, followed by emissions associated with electricity and natural gas consumption.

Although the magnitude of GHG emissions would be reduced compared to the Proposed Project, emissions under Alternative 2 would still be expected to exceed the South Coast AQMD bright-line threshold of 3,000 MT CO_2e per year. Therefore, GHG impacts under Alternative 2 would remain significant and unavoidable. While Alternative 2 would reduce the severity of GHG impacts, it would not avoid or reduce those impacts to a less than significant level.

Under Alternative 2, the policies and actions of the Focused GPU— including those that encourage multimodal transportation, reduced reliance on single-occupant vehicles, and energy-efficient development—would be implemented. These policies are consistent with GHG reduction strategies identified in the 2022 CARB Scoping Plan and SCAG's Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Although Alternative 2 would not implement the BCSP-specific goals and policies that promote higher-density, mixed-use development in the City's core, future development would remain subject to applicable State and regional GHG reduction regulations, including CALGreen, Building Energy Efficiency Standards, vehicle emissions standards, and renewable energy requirements. As discussed in Section 4.13, Transportation, implementation of the Focused GPU would not result in a significant increase in vehicle miles traveled.

Accordingly, Alternative 2 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts under Threshold GHG-b would remain less than significant. Relative to the Proposed Project, impacts under Threshold GHG-b

would be similar, as Alternative 2 would continue to implement the Focused GPU policies that support long-term reductions in per-capita GHG emissions.

Alternative 2 would reduce the magnitude of construction- and operation-related GHG emissions compared to the Proposed Project due to reduced residential and non-residential development and elimination of the BCSP. However, GHG emissions would still exceed the applicable South Coast AQMD significance threshold. Therefore, GHG impacts under Alternative 2 would remain significant and unavoidable, though less severe than those associated with the Proposed Project.

Hazards and Hazardous Materials

As discussed in Section 4.8, Hazards and Hazardous Materials, of this PEIR, the Proposed Project would result in less than significant impacts with regard to hazards and hazardous materials.

Under Alternative 2, future development would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. As with the Proposed Project, potential hazards and hazardous materials conditions associated with future development would be evaluated on a site-specific basis during individual project review. Development facilitated by Alternative 2 would continue to be subject to all applicable Federal, State, and local laws and regulations governing the transport, use, handling, storage, and disposal of hazardous materials, as described in Section 4.8. Compliance with these requirements would ensure that impacts related to hazardous materials management would remain less than significant under Alternative 2, similar to the Proposed Project.

Future development under Alternative 2 would also be required to comply with applicable regulations related to hazardous emissions near sensitive receptors, including schools, and would not result in the routine handling or release of hazardous or acutely hazardous materials in a manner that would pose a significant risk to the public; required to comply with applicable regulations for sites listed pursuant to California Government Code, Section 65962.5, including requirements for site investigation, remediation, and safe reuse; demonstrate consistency with applicable emergency response and evacuation plans during the project approval and environmental review process; and comply with applicable building and fire codes and would be subject to review by the Brea Fire Department. Therefore, with compliance with applicable regulatory requirements, discretionary permit conditions, impacts related to hazards and hazardous materials under Alternative 2 would be less than significant. Although Alternative 2 would reduce the overall development intensity compared to the Proposed Project, the nature and significance of hazards-related impacts would be similar, with a slight reduction in impact severity due to reduced development.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, of this PEIR, the Proposed Project would result in less than significant impacts with regard to hydrology and water quality.

Under Alternative 2, future development would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. As with the Proposed Project, the potential for future development to affect surface water quality, groundwater quality, groundwater supplies or recharge, or to conflict with applicable surface- and groundwater plans would depend on the specific characteristics and locations of individual development projects.

Potential hydrology and water quality impacts under Alternative 2 would be evaluated on a site-specific basis during individual project approval and environmental review, as required by CEQA. Future development could occur in both developed and undeveloped areas; however, all projects would be required to comply with applicable Federal, State, and local regulations, including the NPDES permit and BCC requirements, as outlined in Section 4.9, Hydrology and Water Quality. Compliance with these requirements, along with implementation of standard erosion control measures, stormwater best management practices, and other applicable mitigation measures, would minimize the potential for adverse effects on hydrology and water quality. The BCSP area is largely composed of impervious surfaces, and even without the BCSP, the Project area would still have the potential to be developed. However, with fewer housing units and less non-residential areas, the reduced overall development intensity would likely result in less ground-disturbing activities compared to the Proposed Project. As a result, Alternative 2 would reduce the overall potential for impacts to cultural resources relative to the Proposed Project.

As with the Proposed Project, impacts related to water quality, groundwater supplies and recharge, and consistency with applicable surface- and groundwater management plans under Alternative 2 would be less than significant. However, Alternative 2 would reduce overall development intensity compared to the Proposed Project, therefore, the nature and significance of hydrology and water quality impacts would be similar, with a modest reduction in impact severity due to reduced development.

Land Use and Planning

As discussed in Section 4.10, Land Use and Planning, of this PEIR, the Proposed Project would result in less than significant impacts with regard to land use and planning.

Under Alternative 2, the Focused GPU would be adopted; however, the BCSP would not be implemented. Compared to the Proposed Project, Alternative 2 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment. As with the Proposed Project, goals, policies, and actions from the Focused GPU would be adopted, complying with recent changes to

State general plan and housing laws, and integrate land use, housing, and transportation planning to the same degree as the Proposed Project. However, new zoning designations, MU-18 and MU-50 (Mixed-Use up to 50 dwelling units per acre) and other mobility actions would not be implanted, which are aligned with the City's visions with the adopted 2017 Brea Envisions Community Strategic Plan and the 2020 Brea Connecting the Core Active Transportation Plan Therefore, impacts under Alternative 2 would be greater compared to the Proposed Project.

Noise

As discussed in Section 4.11, Noise, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to noise even with implementation of mitigation measure MM NOI-1 through MM NOI-4.

Compared to the Proposed Project, Alternative 2 would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. This reduced development intensity would result in lower overall construction and operational noise and vibration. However, as with the Proposed Project, construction of future development allowed under Alternative 2 could also result in noise levels that could exceed significance thresholds, even with mandatory compliance with BCC requirements. Therefore, for discretionary projects requiring CEQA review, implementation of mitigation measures (MM NOI-1 through MM NOI-3), in addition to BCC compliance, would help to reduce the potentially significant construction- and operational-related noise impacts.

As with the Proposed Project, future projects' potential to generate excessive noise levels during construction and operation would be dependent on the construction and operation characteristics of individual projects and individual project sites. Noise impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. If development projects can demonstrate compliance with the City's established noise thresholds, with or without mitigation measures incorporated, then impacts related to noise would be considered less than significant. However, since the timing, intensity, surrounding uses, and design of future development permitted under Alternative 2 is unknown at this time, it would be speculative to assume that all future projects under Alternative 2 would be able to reduce their noise and vibration levels below established thresholds during construction and operation, even with mitigation measures incorporated. Therefore, noise impacts would remain significant and unavoidable. As with the Proposed Project, Alternative 2 is anticipated to reduce vibration-related impacts to a less than significant level with implementation of MM BIO-4, and no significant and unavoidable impact would remain.

Alternative 2 would reduce the overall magnitude of noise and vibration impacts compared to the Proposed Project due to reduced residential and non-residential development; however, without site-specific information and analysis, it cannot be determined that impacts can be reduced to less

than significant level at this time. Therefore, noise impacts under Alternative 2 would remain significant and unavoidable, though less severe than those associated with the Proposed Project.

Public Services

As discussed in Section 4.12, Public Services, of this PEIR, the Proposed Project would result in less than significant impacts with regard to public services.

Under Alternative 2, future development would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. As a result, overall demand for public services under Alternative 2 would be lower than under the Proposed Project.

With respect to fire and police protection services, reduced buildout development intensity under Alternative 2 would result in lower demand for emergency response services. If new or expanded fire or police facilities were required to serve development under Alternative 2, such facilities would be subject to separate environmental review and applicable mitigation requirements to address any potential physical impacts. Accordingly, impacts related to fire and police services would remain less than significant, similar to the Proposed Project, with reduced impact severity due to lower service demand.

Regarding schools, reduced residential development under Alternative 2 would generate fewer students compared to the Proposed Project. As with the Proposed Project, impacts on school facilities would be addressed through compliance with applicable regulations, including payment of statutory school impact fees, which are deemed to fully mitigate the impacts of development on school facilities under CEQA. Therefore, impacts related to schools would remain less than significant, with reduced severity compared to the Proposed Project.

Demand for parks, recreational facilities, and other public facilities, such as libraries, would also be lower under Alternative 2 due to reduced population and employment growth. If new or expanded facilities were required, their development would be subject to environmental review and the implementation of appropriate mitigation measures to minimize physical impacts. Consequently, impacts related to parks, recreation, and other public facilities would remain less than significant, similar to the Proposed Project, with a reduction in impact severity attributable to reduced development.

With compliance with applicable regulatory requirements and project-level environmental review, impacts to public services under Alternative 2 would be less than significant. While the significance conclusions would remain the same as for the Proposed Project, the overall severity of public services impacts under Alternative 2 would be reduced due to reduced development intensity.

Transportation

As discussed in Section 4.13, Transportation, of this PEIR, the Proposed Project would result in less than significant impacts with regard to transportation.

Under Alternative 2, the Focused GPU would be adopted; however, the BCSP would not be implemented; resulting in a decrease of 9.7 percent housing and resident, and one percent less non-residential development and employment at buildout. The goals, policies, and actions of the Focused GPU would remain unchanged. Therefore, all goals, policies and actions supporting regional circulation, local circulation, complete streets, and pedestrian and bicycle facilities in the new Mobility Element would be provided, and Alternative 2 would achieve similar benefits as the Proposed Project pertaining to mobility and transportation. However, the BCSP builds upon and advances these Mobility Element goals to strengthen the overall mobility framework within the BCSP area, and these benefits would not occur under Alternative 2. Regarding VMT, the Proposed Project is projected to result in VMT per service population that is lower than the 2003 Brea General Plan buildout VMT per service population. Therefore, it is assumed that a slight reduction in development density would likely to result in greater VMT impacts compared to the Proposed Project. Alternative 2 would likely result in greater transportation impacts compared to the Proposed Project.

Tribal Cultural Resources

As discussed in Section 4.14, Tribal Cultural Resources, of this PEIR, with implementation of MM TCR-1, the Proposed Project would result in less than significant impacts with regard to Tribal Cultural Resources.

Under Alternative 2, future development would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. As a result, the overall extent of grading, excavation, and other ground-disturbing activities would be reduced relative to the Proposed Project, thereby reducing the potential for impacts to Tribal Cultural Resources. As with the Proposed Project, future development under Alternative 2 would be subject to the requirements of Senate Bill 18 and Assembly Bill 52, as applicable, including Tribal consultation during the project review process. These requirements ensure that Tribal Cultural Resources are appropriately identified and that measures are implemented to avoid, minimize, or mitigate potential impacts. Development under Alternative 2 would also remain subject to Mitigation Measure MM TCR-1 and other applicable regulatory requirements.

Therefore, impacts related to Tribal Cultural Resources under Alternative 2 would remain less than significant. While the significance determination would be the same as for the Proposed Project, the overall severity of potential impacts would be reduced due to the lower development intensity associated with Alternative 2.

Utilities and Service Systems

As discussed in Section 4.15, Utilities and Service Systems, of this PEIR, with implementation of MM UTL-1, the Proposed Project would result in less than significant impacts with regard to utilities and service systems.

Under Alternative 2, future development would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. The reduction would only be within the BCSP area, where the area is already served by existing utilities and service systems. No deficiencies pertaining to water, wastewater, and drainage facilities have been identified within the BCSP area, therefore, a slight reduction in development intensity within BCSP area is not anticipated to substantially reduce impacts pertaining to these service systems. Development intensity in other areas within the Project area would not change compared to the Proposed Project. As with the Proposed Project, future development under Alternative 2 would be required to be evaluated on a site-specific basis during individual project review and comply with applicable State, regional, and local regulations as outlined in Section 4.15, Utilities and Service Systems, and the significance determination under Alternative 2 is not anticipated to change, compared to the Proposed Project. Impacts would remain less than significant with implementation of MM UTL-1, similar to the Proposed Project, though the severity would lessen slightly as development intensity would decrease slightly.

Wildfire

As discussed in Section 4.16, Wildfire, of this PEIR, Proposed Project would result in less than significant impacts with regard to wildfire.

Under Alternative 2, future development would result in approximately 9.7 percent fewer housing units and residents, and approximately one percent less non-residential development and employment at buildout. This alternative would reduce overall development intensity within the BCSP area only. Therefore, development intensity within all other areas of the City would not change. The BCSP area is not within the very high or high FHSZ, therefore, reduction in development intensity within this area would not substantially lessen wildfire impacts within the Project area. As with the Proposed Project, future projects' potential for wildfire would be determined on a site-by-site basis and would be evaluated during their individual approval and or/environmental review process in accordance with CEQA, as applicable. As with the Proposed Project, development under this alternative would be required to comply with the California Fire Code, California Building Code, Public Resources Code and the City of Brea's standards for fire protection, including providing fuel modification zones and implementing noncombustible construction and plants and landscaping, consistent with the Brea Hillside Zoning Ordinance and the Brea Fire Department Fuel Modification Guideline. Therefore, impacts would be less than significant, similar in nature and severity to the Proposed Project.

7.4.2.2 Ability to Meet Project Objectives

The Alternative 2 would eliminate the BCSP project from the Proposed Project. Under Alternative 2, the Focused GPU would be adopted but the land use increase proposed under BCSP would not be included. Instead, the units under the current 2003 Brea General Plan would be assumed within the BCSP area. The proposed goals, policies, and actions of the Focused GPU would not change and be implemented, but none of the BCSP goals and policies would be implemented. As a result, Alternative 2 would not fully achieve the project objectives, including the following:

- Accommodate a diverse range of housing development options and densities, ensuring that residents across income levels, age groups, and those with special needs can live within the community;
- Advance economic development policies that support existing local businesses, attract new businesses, and promote job growth;
- Encourage the long-term economic success of Downtown Brea and the community's corridors as mixed-use activity nodes;
- Balance jobs and housing to create an economically sustainable community with reduced impacts on the City's transportation network;
- Preserve the natural environment, including open spaces, hillsides, and wildlife;
- Maintain adequate, reliable, and essential public infrastructure and facilities, including transportation and utilities to support both existing and future development;
- Provide for a wide range of housing opportunities in close proximity to existing and future employment centers and transportation facilities, consistent with the need identified in the City's 2021-2029 Housing Element and local and regional jobs/housing balance policies including SCAG's Connect SoCal through regional programs such as the Sustainable Communities Program and related housing planning initiatives; and
- Support intensification and redevelopment within the Brea Core Area through implementation and adoption of the BCSP.

7.4.2.3 Ability to Reduce the Project Impacts

Alternative 2 would not eliminate the significant and unavoidable impacts that would occur with the Proposed Project. Additionally, the following environmental issue areas would be greater with Alternative 2 when compared to the Proposed Project:

- Land Use and Planning
- Transportation

Alternative 2 would result in reduced impacts for the following environmental topic area when compared to the Proposed Project:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleo Only)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Tribal Cultural Resources
- Utilities and Service Systems

Alternative 2 would result in similar impacts to the Proposed Project in the following environmental topic areas:

- Biological Resources
- Wildfire

7.4.3 Alternative 3: Reduced Intensity Alternative

The Alternative 3: Reduced Intensity Alternative would reduce the overall intensity of the Proposed Project by 30 percent, including the BCSP development intensity. As shown in Table 7-4, Alternative 3: Reduced Intensity Compared to the Proposed Project, this alternative would result in 16,615 housing units (net decrease of 7,121 housing units), and 47,353 population (net decrease of 20,294 residents), 21,411,035 square feet of non-residential (net decrease of 9,176,158 square feet), and 51,596 jobs (net decrease of 22,113 jobs) compared to the Proposed Project. The proposed goals, policies, and actions of the Focused GPU would not change and be implemented. The purpose of this alternative is to potentially reduce the severity of potential impacts to air quality, GHG emissions, and noise, as overall development of residential and non-residential would be less than what could be developed with the Proposed Project.

Table 7-4. Alternative 3: Reduced Intensity Compared to the Proposed Project

Description	Units	Population	NRSF	Jobs
Alternative 3: Reduced Intensity	16,615	47,353	21,411,035	51,596
Proposed Project	23,736	67,647	30,587,193	73,709
Difference: Proposed Project – Alternative 3	-7,121 (30%)	-20,294 (30%)	-9,176,158 (30%)	-22,113 (30%)

Notes: NRSF = non residential square footage

7.4.3.1 Impact Analysis

As documented in Chapter 4, Environmental Analysis, the PEIR analyzed potential environmental effects in the environmental issue areas described below. Therefore, the environmental analysis for Alternative 3 is also limited to these issue areas, where differences among alternatives could yield meaningful comparative analysis of environmental effects.

Aesthetics

As discussed in Section 4.1, Aesthetics, of this PEIR, the Proposed Project would result in less than significant impacts with regard to aesthetics.

Alternative 3 would reduce the overall intensity of the Proposed Project by 30 percent, including the BCSP development intensity. The goals, policies, and actions of the Focused GPU would remain the same. Under this alternative, benefits from the improved and updated goals and policies related to scenic vistas, hillside development, community design and placemaking, and natural open space pursuant to the Focused GPU would occur, and a reduction in development intensity would likely to be have a reduced impacts related to aesthetics, including scenic vistas, scenic resources within a State scenic highway, applicable regulations governing scenic quality, and light and glare. The added benefits from mobility and beautification from the BCSP would also occur under Alternative 3, including coordinated streetscape improvements. Although impacts would remain less than significant, similar to the Proposed Project, the severity of these impacts would be lower due to reduced growth under Alternative 3 compared to the Proposed Project.

Air Quality

As discussed in Section 4.2, Air Quality, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to air quality even with implementation of Mitigation Measure MM AQ-1.

Alternative 3 would reduce the overall intensity of the Proposed Project by 30 percent, including the BCSP development intensity. The goals, policies, and actions of the Focused GPU would remain the same, and future development would continue to be subject to applicable Federal, State, and local air quality regulations. Growth projections from local general plans adopted by cities in the district are provided to SCAG, which develops regional growth forecasts that are then used to develop future air quality forecasts for the AQMP. Typically, development consistent with a local adopted General Plan is considered to be consistent with the AQMP. Alternative 3 would accommodate growth within the Project area beyond the adopted 2003 Brea General Plan. Therefore, as with the Proposed Project, growth under Alternative 3 would not be consistent with the assumptions used in the applicable AQMP, and would conflict with AQMP implementation.

Compared to the Proposed Project, Alternative 3 would result in a net decrease of approximately 9.7 percent in housing units and population, and a reduction of approximately one percent in non-residential square footage and employment. This slight reduction in overall development intensity would result in lower total construction activity and associated construction emissions compared to the Proposed Project. However, maximum daily construction emissions of VOC and NOx could still exceed South Coast AQMD thresholds, and construction-phase air quality impacts would remain significant, requiring project-level mitigation.

With respect to operations, Alternative 3 would generate slightly fewer long-term emissions than the Proposed Project due to reduced residential and non-residential development. Therefore, operational emissions from stationary and mobile sources would still likely exceed South Coast AQMD thresholds for VOC and PM_{10}. Accordingly, operational air quality impacts under Alternative 3 would remain significant and unavoidable.

Regarding TACs, as with the Proposed Project, construction activities under Alternative 3 would be temporary, intermittent, and not concentrated at a single location over extended periods; therefore, construction-related impacts under Alternative 3 would likely remain less than significant. Furthermore, as discussed for the Proposed Project, continued implementation of CARB regulations—such as cleaner fuels, off-road diesel engine retrofits, and newer low-emission equipment—would further reduce DPM emissions over time. As with the Proposed Project, potential exposure of new sensitive receptors to TACs would require site-specific evaluation as outlined in PPP AQ-2, therefore, as with the Proposed Project, TAC-related impacts would be less than significant.

Alternative3 would reduce overall construction and operational emissions compared to the Proposed Project but would still result in significant and unavoidable air quality impacts. Impacts would be less severe but not avoided.

Biological Resources

As discussed in Section 4.3, Biological Resources, of this PEIR, with the implementation of Mitigation Measures MM BIO-1 through MM BIO-8, the Proposed Project would result in less than significant impacts with regard to biological resources.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. Unlike much of the incorporated City, which is largely developed, the Hillside Residential area in SOI remains largely undeveloped and therefore has the greatest potential to affect biological resources. Under this alternative, development intensity within the Hillside Residential area would also be reduced by 30 percent, therefore, reduce total areas and decrease associated biological resources impacts. Similarly, in other areas of the Project area, a reduction in development intensity is likely to reduce

the total area of disturbance, construction duration, and other operational impacts, therefore, decrease both direct and indirect impacts to associated biological resources.

As with the Proposed Project, the potential for future development under Alternative 3 to impact biological resources would be evaluated on a site-specific basis during individual project approval and environmental review, as required by CEQA. Future development would be subject to applicable discretionary permits and would be required to comply with all applicable Federal, State, and local regulations for the protection of biological resources.

Alternative 3 would reduce overall construction and operational biological resources impacts compared to the Proposed Project, but would still require implementation of MM BIO-1 through MM BIO-8 to reduce potential impacts to a less than significant level.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, of this PEIR, with the implementation of Mitigation Measures MM CUL-1 through MM CUL-4, the Proposed Project would result in less than significant impacts with regard to cultural resources.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. Cultural resources (historical, archaeological, and human remains) may be present in both developed and undeveloped areas of the City, and potential impacts would need to be evaluated on a site-specific basis as individual development projects are proposed. The reduced overall development intensity would likely result in less demolition and fewer ground-disturbing activities compared to the Proposed Project. As a result, Alternative 3 would reduce the overall potential for impacts to cultural resources relative to the Proposed Project.

As with the Proposed Project, future development under Alternative 3 would be subject to applicable discretionary permits and would be required to comply with all applicable Federal, State, and local laws and regulations for the protection of cultural resources. In addition, development under Alternative 3 would remain subject to the cultural resources mitigation measures identified in this PEIR.

Therefore, impacts to cultural resources under Alternative 3 would be less than significant with compliance with applicable regulatory requirements and mitigation measures. While the significance determination would remain the same as for the Proposed Project, the overall severity of potential impacts under Alternative 3 would be reduced.

Energy

As discussed in Section 4.5, Energy, of this PEIR, the Proposed Project would result in less than significant impacts with regard to energy.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As with the Proposed Project, individual development projects under Alternative w would be required to comply with applicable State regulatory requirements, as outlined in Section 4.5, Energy, to avoid wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation. In addition, development under Alternative 3 would be required to comply with applicable building standards, including the California Building Energy Efficiency Standards (Title 24) and CALGreen. Future development under Alternative 3 would remain subject to existing and future energy efficiency regulations, and because overall development intensity would be lower than under the Proposed Project, lower energy consumption is anticipated, and energy impacts under Alternative 3 would be less than those identified for the Proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, of this PEIR, the Proposed Project with implementation of mitigation measure MM GEO-1 (related to paleontological resources) impacts with regard to geology and soils would be less than significant.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As a result, the overall extent of grading, excavation, and other ground-disturbing activities would be reduced relative to the Proposed Project. However, similar to the Proposed Project, development under Alternative 3 could involve grading and excavation in areas underlain by geologic units with the potential to contain paleontological resources, including previously undeveloped areas or areas requiring deeper excavation associated with redevelopment. Because the presence or absence of paleontological resources cannot be determined without site-specific geologic investigations and knowledge of project-level construction depths, the potential for inadvertent discovery and disturbance of paleontological resources during future development under Alternative 3 remains.

As with the Proposed Project, adoption of Alternative 3 would not, by itself, result in physical ground disturbance. Potential impacts to paleontological resources would occur only as a result of future development projects and would be evaluated on a site-specific basis during individual project review. Future development under Alternative 3 would be subject to applicable discretionary approvals and would be required to comply with all applicable Federal, State, and local regulations related to paleontological resource protection. In addition, development facilitated by Alternative 3 would remain subject to implementation of MM GEO-1, which requires a site-specific evaluation to determine whether ground-disturbing activities could occur and to provide appropriate mitigation

measure. Therefore, impacts to paleontological resources under Alternative 3 would be less than significant with compliance with applicable regulatory requirements and MM GEO-2. While the significance determination would remain the same as for the Proposed Project, the overall severity of potential impacts under Alternative 3 would be reduced.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to greenhouse gas emissions even with implementation of mitigation measure MM GHG-1.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. The goals, policies, and actions of the Focused GPU would remain unchanged and would be implemented. Compared to the Proposed Project, Alternative 3 would result in substantial reductions in residential units, population, non-residential development, and employment.

Due to the reduced development intensity, Alternative 3 would result in lower construction-related GHG emissions as a result of decreased demolition and construction activity. Long-term operational GHG emissions from mobile sources, electricity and natural gas consumption, water and wastewater conveyance, and solid waste generation would also be proportionally reduced compared to the Proposed Project. The Proposed Project is projected to result in a net increase inf GHG emissions by 10,607 MT CO_2e. Therefore, even with 30 percent reduction, the South Coast AQMD bright-line threshold of 3,000 MT CO_2e would still be exceeded. Therefore, GHG impacts under Alternative 3 would remain significant and unavoidable. While Alternative 3 would substantially reduce the severity of GHG impacts compared to the Proposed Project, it would not avoid or reduce those impacts to a less than significant level.

Under Alternative 3, the policies and actions of the Focused GPU would continue to be implemented, including policies that support multimodal transportation, reduced reliance on single-occupant vehicles, energy-efficient development, and compact growth patterns. These policies are consistent with the GHG reduction strategies identified in the 2022 CARB Scoping Plan and SCAG's Connect SoCal.

Although Alternative 3 would reduce overall development intensity, it would not include any components that would conflict with or obstruct implementation of applicable State or regional GHG reduction programs. Future development would remain subject to CALGreen, Building Energy Efficiency Standards, vehicle emissions standards, and renewable energy requirements. As discussed in Section 4.13, Transportation, implementation of the Focused GPU would not result in a significant increase in vehicle miles traveled.

Accordingly, Alternative 3 would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts under Threshold GHG-b would remain less than significant. Relative to the Proposed Project, impacts under Threshold GHG-b would be similar, as Alternative 3 would continue to implement the same policy framework that supports long-term reductions in per-capita GHG emissions.

Alternative 3 would substantially reduce the magnitude of construction- and operation-related GHG emissions compared to the Proposed Project due to the reduced development intensity. However, GHG emissions would still exceed the applicable South Coast AQMD significance threshold, and GHG impacts under would remain significant and unavoidable, though they would be less severe than those associated with the Proposed Project.

Hazards and Hazardous Materials

As discussed in Section 4.8, Hazards and Hazardous Materials, of this PEIR, the Proposed Project would result in less than significant impacts with regard to hazards and hazardous materials.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As with the Proposed Project, potential hazards and hazardous materials conditions associated with future development would be evaluated on a site-specific basis during individual project review. Development facilitated by Alternative 3 would continue to be subject to all applicable Federal, State, and local laws and regulations governing the transport, use, handling, storage, and disposal of hazardous materials, as described in Section 4.8. Compliance with these requirements would ensure that impacts related to hazardous materials management would remain less than significant under Alternative 3, similar to the Proposed Project.

Future development under Alternative 3 would also be required to comply with applicable regulations related to hazardous emissions near sensitive receptors, including schools, and would not result in the routine handling or release of hazardous or acutely hazardous materials in a manner that would pose a significant risk to the public; required to comply with applicable regulations for sites listed pursuant to California Government Code, Section 65962.5, including requirements for site investigation, remediation, and safe reuse; demonstrate consistency with applicable emergency response and evacuation plans during the project approval and environmental review process; and comply with applicable building and fire codes and would be subject to review by the Brea Fire Department. Therefore, with compliance with applicable regulatory requirements, discretionary permit conditions, impacts related to hazards and hazardous materials under Alternative 3 would be less than significant. Although Alternative 3 would reduce the overall development intensity compared to the Proposed Project, the nature and significance of hazards-related impacts would be similar, with a slight reduction in impact severity due to reduced development.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, of this PEIR, the Proposed Project would result in less than significant impacts with regard to hydrology and water quality.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As with the Proposed Project, the potential for future development to affect surface water quality, groundwater quality, groundwater supplies or recharge, or to conflict with applicable surface- and groundwater plans would depend on the specific characteristics and locations of individual development projects.

Potential hydrology and water quality impacts under Alternative 3 would be evaluated on a site-specific basis during individual project approval and environmental review, as required by CEQA. Future development could occur in both developed and undeveloped areas; however, all projects would be required to comply with applicable Federal, State, and local regulations, including the NPDES permit and BCC requirements, as outlined in Section 4.9, Hydrology and Water Quality. Compliance with these requirements, along with implementation of standard erosion control measures, stormwater best management practices, and other applicable mitigation measures, would minimize the potential for adverse effects on hydrology and water quality. Alternative 3 would result in fewer housing units and less non-residential areas, therefore, the reduced overall development intensity would likely result in less ground-disturbing activities compared to the Proposed Project. As a result, Alternative 3 would reduce the overall potential for impacts to cultural resources relative to the Proposed Project.

As with the Proposed Project, impacts related to water quality, groundwater supplies and recharge, and consistency with applicable surface- and groundwater management plans under Alternative 3 would be less than significant. However, Alternative 3 would reduce overall development intensity compared to the Proposed Project, therefore, the nature and significance of hydrology and water quality impacts would be similar, with a modest reduction in impact severity due to reduced development.

Land Use and Planning

As discussed in Section 4.10, Land Use and Planning, of this PEIR, the Proposed Project would result in less than significant impacts with regard to land use and planning.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As with the Proposed Project, goals, policies, and actions from the Focused GPU would be adopted, complying with recent changes to State general plan and housing laws, and integrate land use, housing, and transportation planning to the same degree as the Proposed Project. The BCSP would also be adopted, consistent with the City's vision with the adopted 2017 Brea Envisions Community Strategic Plan and the 2020 Brea Connecting the Core Active Transportation Plan, but not to the

degree of the Proposed Project. Furthermore, although speculative, with a 30 percent reduction in housing units, the ability of the City to comply with future Regional Housing Needs Allocation requirements could be limited. Therefore, impacts under Alternative 3 would be greater compared to the Proposed Project.

Noise

As discussed in Section 4.11, Noise, of this PEIR, the Proposed Project would result in significant and unavoidable impacts related to noise even with implementation of mitigation measure MM NOI-1 through MM NOI-4.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. This reduced development intensity would result in lower overall construction and operational noise and vibration. However, as with the Proposed Project, construction of future development allowed under Alternative 2 could also result in noise levels that could exceed significance thresholds, even with mandatory compliance with BCC requirements. Therefore, for discretionary projects requiring CEQA review, implementation of mitigation measures (MM NOI-1 through MM NOI-3), in addition to BCC compliance, would help to reduce the potentially significant construction- and operational-related noise impacts.

As with the Proposed Project, future projects' potential to generate excessive noise levels during construction and operation would be dependent on the construction and operation characteristics of individual projects and individual project sites. Noise impacts would be determined on a project-by-project basis and would be evaluated during their individual approval and/or environmental review process in accordance with CEQA, as applicable. If development projects can demonstrate compliance with the City's established noise thresholds, with or without mitigation measures incorporated, then impacts related to noise would be considered less than significant. However, since the timing, intensity, surrounding uses, and design of future development permitted under Alternative 3 is unknown at this time, it would be speculative to assume that all future projects under Alternative 3 would be able to reduce their noise and vibration levels below established thresholds during construction and operation, even with mitigation measures incorporated. Therefore, noise impacts would remain significant and unavoidable. As with the Proposed Project, Alternative 3 is anticipated to reduce vibration-related impacts to a less than significant level with implementation of MM BIO-4, and no significant and unavoidable impact would remain.

Alternative 3 would reduce the overall magnitude of noise and vibration impacts compared to the Proposed Project due to reduced residential and non-residential development; however, without site-specific information and analysis, it cannot be determined that impacts can be reduced to less than significant level at this time. Therefore, noise impacts under Alternative 3 would remain significant and unavoidable, though less severe than those associated with the Proposed Project.

Public Services

As discussed in Section 4.12, Public Services, of this PEIR, the Proposed Project would result in less than significant impacts with regard to public services.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As a result, overall demand for public services under Alternative 1 would be lower than under the Proposed Project.

With respect to fire and police protection services, reduced buildout development intensity under Alternative 3 would result in lower demand for emergency response services. If new or expanded fire or police facilities were required to serve development under Alternative 3, such facilities would be subject to separate environmental review and applicable mitigation requirements to address any potential physical impacts. Accordingly, impacts related to fire and police services would remain less than significant, similar to the Proposed Project, with reduced impact severity due to lower service demand.

Regarding schools, reduced residential development under Alternative 3 would generate fewer students compared to the Proposed Project. As with the Proposed Project, impacts on school facilities would be addressed through compliance with applicable regulations, including payment of statutory school impact fees, which are deemed to fully mitigate the impacts of development on school facilities under CEQA. Therefore, impacts related to schools would remain less than significant, with reduced severity compared to the Proposed Project.

Demand for parks, recreational facilities, and other public facilities, such as libraries, would also be lower under Alternative 3 due to reduced population and employment growth. If new or expanded facilities were required, their development would be subject to environmental review and the implementation of appropriate mitigation measures to minimize physical impacts. Consequently, impacts related to parks, recreation, and other public facilities would remain less than significant, similar to the Proposed Project, with a reduction in impact severity attributable to reduced development.

With compliance with applicable regulatory requirements and project-level environmental review, impacts to public services under Alternative 3 would be less than significant. While the significance conclusions would remain the same as for the Proposed Project, the overall severity of public services impacts under Alternative 3 would be reduced due to reduced development intensity.

Transportation

As discussed in Section 4.13, Transportation, of this PEIR, the Proposed Project would result in less than significant impacts with regard to transportation.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. The goals, policies, and actions of the Focused GPU would remain unchanged. Therefore, all goals, policies and actions supporting regional circulation, local circulation, complete streets, and pedestrian and bicycle facilities in the new Mobility Element would be provided, and Alternative 3 would achieve similar benefits as the Proposed Project pertaining to mobility and transportation. Regarding VMT, the Proposed Project is projected to result in VMT per service population that is lower than the 2003 Brea General Plan buildout VMT per service population. Therefore, it is assumed that a slight reduction in development density would likely to result in greater VMT impacts compared to the Proposed Project. Alternative 3 would likely result in greater transportation impacts compared to the Proposed Project.

Tribal Cultural Resources

As discussed in Section 4.14, Tribal Cultural Resources, of this PEIR, with implementation of MM TCR-1, the Proposed Project would result in less than significant impacts with regard to Tribal Cultural Resources.

Under Alternative 3, the overall development intensity of the Proposed Project, including development within the BCSP area, would be reduced by approximately 30 percent. As a result, the overall extent of grading, excavation, and other ground-disturbing activities would be reduced relative to the Proposed Project, thereby reducing the potential for impacts to Tribal Cultural Resources. As with the Proposed Project, future development under Alternative 3 would be subject to the requirements of Senate Bill 18 and Assembly Bill 52, as applicable, including Tribal consultation during the project review process. These requirements ensure that Tribal Cultural Resources are appropriately identified and that measures are implemented to avoid, minimize, or mitigate potential impacts. Development under Alternative 3 would also remain subject to Mitigation Measure MM TCR-1 and other applicable regulatory requirements.

Therefore, impacts related to Tribal Cultural Resources under Alternative 3 would remain less than significant. While the significance determination would be the same as for the Proposed Project, the overall severity of potential impacts would be reduced due to the lower development intensity associated with Alternative 3.

Utilities and Service Systems

As discussed in Section 4.15, Utilities and Service Systems, of this PEIR, with implementation of MM UTL-1, the Proposed Project would result in less than significant impacts with regard to utilities and service systems.

Under Alternative 3, the overall development intensity of the Proposed Project would be reduced by approximately 30 percent. Consequently, this alternative would reduce associated utilities demand by approximately 30 percent. As with the Proposed Project, future development under Alternative 3 would be evaluated on a site-specific basis during individual project review and comply with applicable State, regional, and local regulations as outlined in Section 4.15, Utilities and Service Systems; and the significance determination under Alternative 3 is not anticipated to change, compared to the Proposed Project. Impacts would remain less than significant with implementation of MM UTL-1, similar to the Proposed Project, though the severity would lessen as development intensity would decrease.

Wildfire

As discussed in Section 4.16, Wildfire, of this PEIR, the Proposed Project would result in less than significant impacts with regard to wildfire.

Under Alternative 3, the overall development intensity of the Proposed Project would be reduced by approximately 30 percent. This alternative would reduce overall development intensity Citywide, including the BCSP area and the Hillside Residential zoning district within SOI. The entire SOI portion of the Project area is within the State Responsibility Area's Very High FHSZ, and approximately northeastern half of the incorporated City boundaries are within the Local Responsibility Area's Very High FHSZ. Therefore, a 30 percent reduction in development intensity within the undeveloped area would likely reduce potential wildfire impacts. Future projects' potential for wildfire would be determined on a site-by-site basis and would be evaluated during their individual approval and or/environmental review process in accordance with CEQA, as applicable. As with the Proposed Project, development under this alternative would be required to comply with the CFC, CBC, PRC and the City of Brea's standards for fire protection, including providing fuel modification zones and implementing noncombustible construction and plants and landscaping, consistent with the Brea Hillside Zoning Ordinance and the Brea Fire Department Fuel Modification Guideline. Therefore, impacts would be less than significant, similar to the Proposed Project, though less severe than those associated with the Proposed Project.

7.4.3.2 Ability to Meet Project Objectives

Alternative 3 would reduce the overall intensity of the Proposed Project by 30 percent, including the BCSP development intensity. The proposed goals, policies, and actions of the Focused GPU would not change and be implemented. As a result, Alternative 3 would not fully achieve the project objectives, including the following:

- Accommodate a diverse range of housing development options and densities, ensuring that residents across income levels, age groups, and those with special needs can live within the community.
- Advance economic development policies that support existing local businesses, attract new businesses, and promote job growth.
- Encourage the long-term economic success of Downtown Brea and the community's corridors as mixed-use activity nodes.
- Balance jobs and housing to create an economically sustainable community with reduced impacts on the City's transportation network.
- Provide for a wide range of housing opportunities in close proximity to existing and future employment centers and transportation facilities, consistent with the need identified in the City's 2021-2029 Housing Element and local and regional jobs/housing balance policies including SCAG's Connect SoCal through regional programs such as the Sustainable Communities Program and related housing planning initiatives.
- Support intensification and redevelopment within the Brea Core Area through implementation and adoption of the BCSP.

7.4.3.3 Ability to Reduce the Project Impacts

Alternative 3 would not eliminate the significant and unavoidable impacts that would occur with the Proposed Project. Additionally, the following environmental issue areas would be greater with Alternative 3 when compared to the Proposed Project:

- Land Use and Planning
- Transportation

Alternative 3 would result in reduced impacts for the following environmental topic area when compared to the Proposed Project:

- Aesthetics
- Biological Resources
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleo Only)

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

7.5 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative, the alternative having the potential for the fewest environmental impacts, from among the range of reasonable alternatives that are evaluated.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR pursuant to CEQA Guidelines Section 15126.6(c) include: (i) failure to meet most of the basic project objectives; (ii) infeasibility, or (iii) inability to avoid significant environmental impacts" (CEQA Guidelines Section 15126.6[c]).

Alternative 3, Reduced Intensity Alternative, has been identified as the environmentally superior alternative.

Table 7-5, Summary of Alternatives Impacts Compared to the Proposed Project, provides a summary comparison of the alternatives with the Proposed Project to highlight if each alternative would result in a similar, greater, or lesser impact regarding potentially significant impacts. Although all three alternatives would reduce impacts pertaining to air quality, GHG emissions, and noise, it would not be to the degree to eliminate the significant and unavoidable impacts.

Table 7-5. Summary of Alternatives Impacts Compared to the Proposed Project

Issue Areas	Proposed Project		Alternatives to the Proposed Project		
	Focused GPU	BCSP	Alternative 1	Alternative 2	Alternative 3
4.1 Aesthetics	LTS	LTS	▼	▼	▼
4.2 Air Quality	SU	SU	▼	▼	▼
4.3 Biological Resources	LTSM	LTSM	=	=	▼
4.4 Cultural Resources	LTSM	LTSM	▼	▼	▼
4.5 Energy	LTS	LTS	▼	▼	▼
4.6 Geology and Soils (Paleo Only)	LTSM	LTSM	▼	▼	▼
4.7 Greenhouse Gas Emissions	SU	SU*	▼	▼	▼
4.8 Hazards and Hazardous Materials	LTS	LTS	▼	▼	▼
4.9 Hydrology and Water Quality	LTS	LTS	▼	▼	▼
4.10 Land Use and Planning	LTS	LTS	▲	▲	▲

Table 7-5. Summary of Alternatives Impacts Compared to the Proposed Project

Issue Areas	Proposed Project		Alternatives to the Proposed Project		
	Focused GPU	BCSP	Alternative 1	Alternative 2	Alternative 3
4.11 Noise	SU	SU*	▼	▼	▼
4.12 Public Services	LTS	LTS	▼	▼	▼
4.13 Transportation	LTS	LTS	▲	▲	▲
4.14 Tribal Cultural Resources	LTSM	LTSM	▼	▼	▼
4.15 Utilities and Service Systems	LTSM	LTSM	▼	▼	▼
4.16 Wildfire	LTS	LTS	=	=	▼

Notes: LTS = Less than Significant Impact; LSTM = Less than Significant Impact with Mitigation; SU = Significant and Unavoidable Impact

* BCSP would result in individually less than significant impacts without mitigation, however, would contribute to cumulative impacts, and would require feasible mitigation measure to be implemented.

▲ Indicates an impact that is greater than the Proposed Project (environmentally inferior).

= Indicates an impact that is neutral or similar to the Proposed Project (neither environmentally superior nor inferior).

▼ Indicates an impact that is less than the Proposed Project (environmentally superior).

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Chapter 8 List of Preparers and Agencies Consulted

This chapter lists the lead agency and consultants who prepared this Program Environmental Impact Report (PEIR) and technical reports and the agencies that provided information used in the preparation of this PEIR.

8.1 Environmental Impact Report Preparation

8.1.1 Lead Agency

Lead Agency

Jason Killebrew, Community Development Director, Assistant City Manager

Maribeth Tinio, City Planner

Ryan Chapman, PE, City Engineer

Jessica Newton, Senior Planner

8.1.2 Consultants

Harris & Associates

William Halligan, Esq., Senior Director/Senior Environmental Counsel

Elizabeth Kim, Senior Project Manager

Yliana Ortega, Project Manager

Andrew Talbert, Project Manager

Esther Daigneault, CEQA Project Manager

Kelsey Hawkins, PMP, Project Manager

Sydnie Margallo, Project Manager

Mia Claridy, Environmental Planner

Sharon Toland, AICP, Senior Air Quality and Noise Specialist

Donna Beddow, Senior Archaeologist

Leona Vander Molen, Technical Editor

Randy Deodat, GIS Analyst

Matthew Dornbach, GIS Analyst

8.2 Technical Reports

8.2.1 Air Quality Analysis – Harris & Associates

Sharon Toland, AICP, Air Quality and Greenhouse Gas Specialist

Kelsey Hawkins, PMP, Air Quality and Greenhouse Gas Analyst

8.2.2 Biological Resources Technical Report – Harris & Associates

Erika Eidson, Biology Manager/Principal Biologist

Kelsea Loescher, Biologist/Deputy Environmental Compliance Manager

8.2.3 Greenhouse Gas Emissions Analysis – Harris & Associates

Sharon Toland, AICP, Air Quality and Greenhouse Gas Specialist

Kelsey Hawkins, PMP, Air Quality and Greenhouse Gas Analyst

8.2.4 Noise Technical Report – Harris & Associates

Sharon Toland, AICP, Noise Specialist

Kelsey Hawkins, PMP, Noise Analyst

8.2.5 Utilities Technical Assessment – Harris & Associates

Water, Sewer, and Drainage Systems Assessments

Stephanie A. Tanverakul, PE, PMP

Water Supply Assessment

Christy Cooper, Senior Consultant

8.2.6 Transportation Impact Analysis – Kittelson & Associates, Inc.

Tim A. Erney, Senior Principal

Karen Pham AICP, RSP

8.3 General Plan and Specific Plan Preparation

8.3.1 Focused General Plan Update – De Novo Planning Group

Amanda Tropiano, Principal

Perry Banner, Principal Planner

8.3.2 Brea Core Specific Plan – RRM Design Group

Jami Williams, Managing Partner

Diane Bathgate, AICP, CNU-A, Principal, Planning & Urban Design

Katja Dillmann, JD, AICP, Manager of Planning & Urban Design

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Chapter 9 References

Executive Summary

None.

Chapter 1: Introduction

None.

Chapter 2: Project Description

None.

Chapter 3: Environmental Setting

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None.

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Chapter 6: Other CEQA Considerations

None.

Chapter 7: Alternatives

None.