

2411 North Glassell Street Project

**DRAFT MITIGATED NEGATIVE DECLARATION
NO. 25-0002**



Lead Agency:

City of Orange
Community Development Department • Planning Division
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Date:

April 2026

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MITIGATED NEGATIVE DECLARATION NO. 25-0002

Project Title:

2411 North Glassell Street Project

Reference Application Numbers:

Conditional Use Permit No. 25-0013

Major Site Plan Review No. 1180

Design Review No. 5154

Lot Line Adjustment No. 2025-03

Environmental Review No. 25-0002

Lead Agency:

City of Orange

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Project Location:

The Project site is located at 2411 North Glassell Street in the City of Orange in Orange County, California. The Project site is located at the southeast corner of the intersection of Glassell Street and Fletcher Avenue.

Existing General Plan Designation:

Light Industrial (LI)

Existing Zoning Classification:

Industrial Manufacturing (M-2)

INTRODUCTION

The applicant for the 2411 North Glassell Street Project (Project) is requesting approval from the City of Orange to demolish the three existing buildings on the site to redevelop the site with a one-story (plus mezzanine), 298,988-square-foot (SF) industrial building with manufacturing and warehousing uses. Additional improvements would include landscaping, utility connections, stormwater facilities, and fencing, as well as pavement of parking areas, loading areas, and driveways.

The City has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) to address and disclose the potential environmental effects of project implementation in compliance with the California Environmental Quality Act (CEQA) and the Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines), Section 15000 et seq.

Consistent with CEQA Guidelines Section 15071, this IS/MND includes a description of the Project, an evaluation of the Project's potential environmental impacts, and findings from the environmental review. This IS/MND determines whether there is substantial evidence the Project may have a significant effect on the environment. The City is the Lead Agency under CEQA, and its Planning Commission is responsible for the adoption of the environmental analysis and approval of the Project.

On April 16, 2026, the City distributed the Draft IS/MND for the 2411 North Glassell Street Project to public agencies and the general public. In accordance with the CEQA Section 21091 and State CEQA Guidelines Section 15073, a 20-day public review period for the Draft IS/MND was provided from April 16, 2026 to May 6, 2026. The Draft IS/MND and supporting attachments were available for review by the general public at the following locations:

- Orange City Hall, Offices of the City Clerk and Community Development Department, 300 East Chapman Avenue, Orange, CA 92866
- City of Orange, Community Development Department, Planning Division Website: <https://www.cityoforange.org/our-city/departments/community-development/planning-division/current-projects>

EXISTING SETTING

Regional Setting:

The Project site is located within the northwestern portion of the city of Orange in Orange County, California. The address of the Project site is 2411 North Glassell Street, which is at the southeast corner of the intersection of Glassell Street and Fletcher Avenue. Regional access to the Project site is provided by State Route (SR) 55 and SR 57. Local access to the Project site is provided by Glassell Street. The Project site and surrounding area are shown in Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*.

Existing Site Conditions:

The Project site includes two parcels, identified as Assessor's Parcel Numbers (APN) 374-381-01 and 374-381-02, which encompass 12.1 net acres. The existing site contains three 2-story concrete tilt-up office buildings, totaling 191,127 SF in a circular building campus layout. The two center buildings are partially connected via a covered walkway. The building campus includes loading docks, driveways, walkways, landscaping, and drainage features such as storm drains and catch basins. The Project site also includes landscaped parking lots on the west and east sides of the building campus.

The Project site gently slopes down towards the west. The northern boundary of the Project site is bordered by a wrought iron fence followed by a vegetated berm planted with trees, which separates the site from Fletcher Avenue. The site's frontage along Glassell Street is lined with ornamental trees. The southern and eastern boundaries are adjacent to existing train tracks and contain a row of shrubs to screen the Project site from the railroad. The interior of the Project site is heavily landscaped with ornamental trees, shrubs, and grass.

Existing access to the Project site is provided via two driveways on Glassell Street. The northern driveway on Glassell Street is located approximately 160 feet south of the Glassell Street and Fletcher Avenue intersection, while the southern driveway on Glassell Street is located approximately 450 feet south of the Glassell Street and Fletcher Avenue intersection. The Project site's existing conditions are shown in Figure 3, *Aerial*, and Figures 4a through 4d, *Existing Site Photos*.

Existing General Plan Land Use and Zoning Designations:

The Project site is designated as Light Industrial (LI) under the City of Orange General Plan. According to the General Plan, the LI designation is intended to accommodate activities such as manufacturing, processing, and distribution of goods. This land use designation permits a maximum floor area ratio (FAR) of 1.0 and structures are limited to a height of three stories or less.

The Project site has a zoning designation of Industrial Manufacturing (M-2). The M-2 zoning designation is intended to provide continuation and development of heavy manufacturing industries in locations where they are compatible with and will not adversely impact adjacent land uses. The maximum permitted building height within the M-2 zone is 45 feet. The minimum setbacks allowed within the M-2 zone are 20 feet when adjacent to a residential zone, 20 feet when adjacent to an arterial street, and 10 feet when adjacent to a local street.

The Project site's existing land use designation is shown in Figure 5, *Existing General Plan Designation*, and existing zoning designation is shown in Figure 6, *Existing Zoning Designation*.

Surrounding Land Uses:

The Project site is surrounded by residential, commercial, and industrial development. An active Burlington Northern Santa Fe (BNSF) railroad borders the site to the east. A former railroad spur borders the site to the south but is no longer operational. The nearest sensitive receptors to the Project site are residences along Fletcher Avenue, located approximately 54 feet north of the Project site's northern boundary.

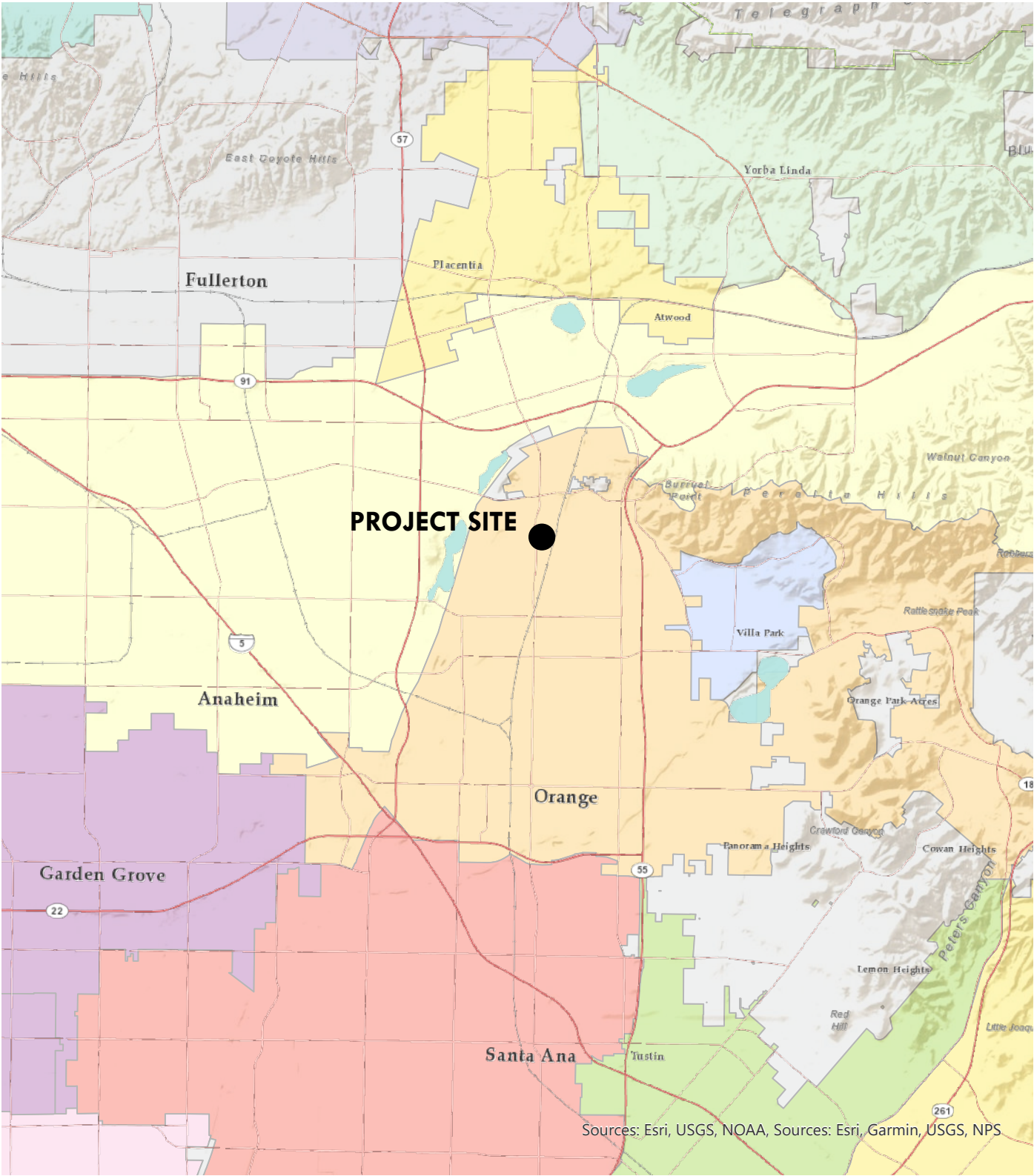
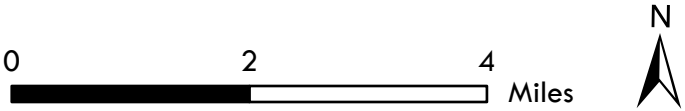
The existing land use, General Plan land use designation, and zoning designation for surrounding parcels are described below in Table 1, *Surrounding Existing Land Use, General Plan Designations, and Zoning Designations*.

Table 1: Surrounding Existing Land Use, General Plan Designations, and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
North	Fletcher Avenue followed by single family residences	Low Density Residential (LDR)	Single-Family Residential 7,000 SF (R-1-7)
South	Former railroad spur followed by warehouses and offices	Light Industrial (LI)	Industrial Manufacturing (M-2)
East	BNSF railroad and N. Orange Olive Road followed by single family residences	Low Density Residential (LDR)	Single-Family Residential 8,000 SF (R-1-8)
West	Glassell Street followed by industrial and commercial businesses	Light Industrial (LI)	Industrial Manufacturing (M-2)

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Regional Location

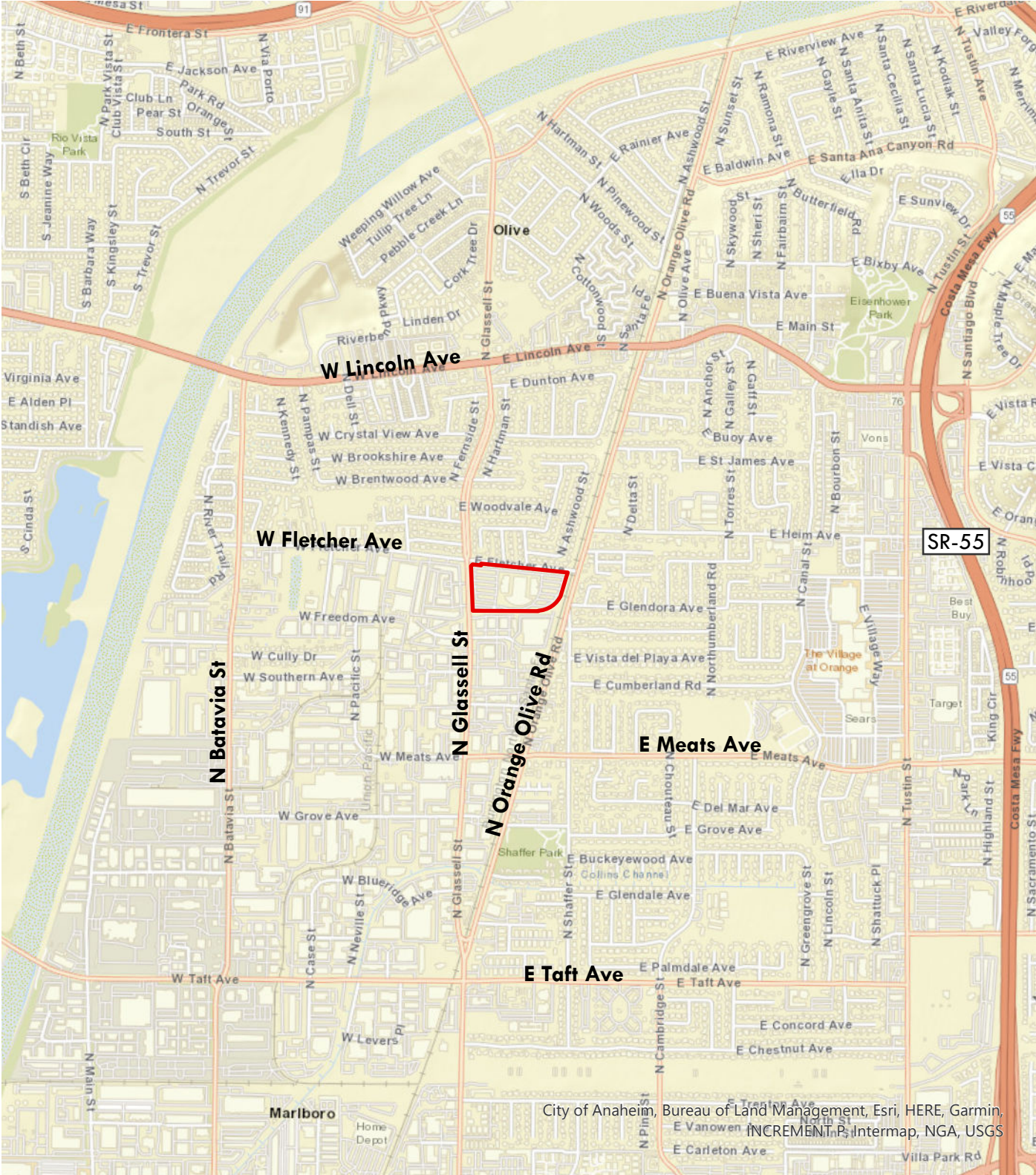


2411 N. Glassell Street
City of Orange

Figure 1

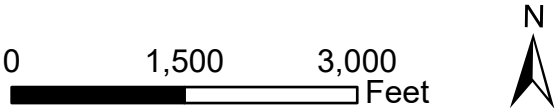
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Local Vicinity



Legend

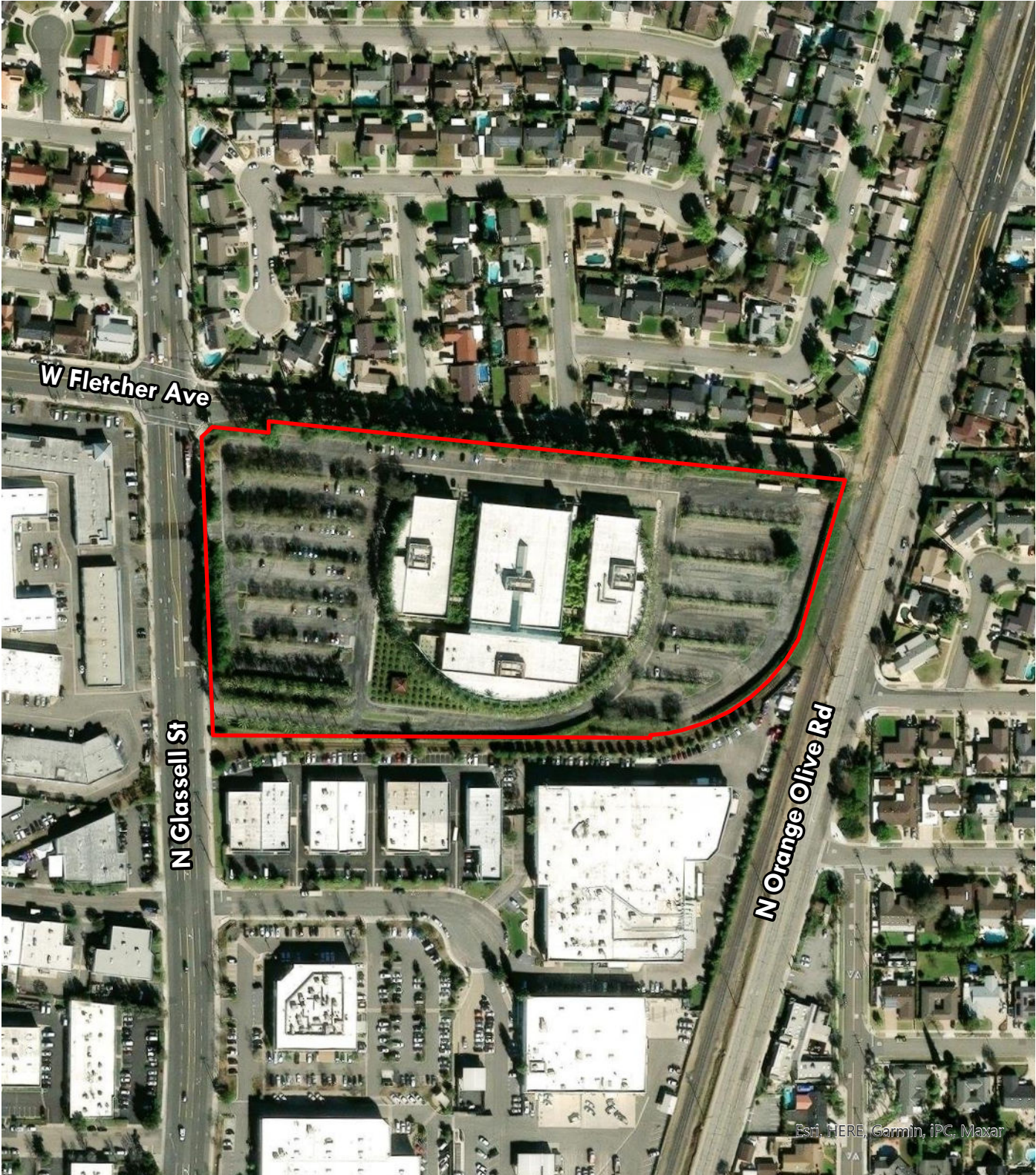
 Project Site



2411 N. Glassell Street
City of Orange

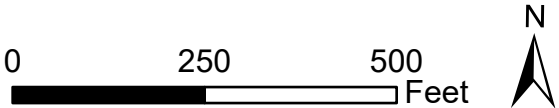
Figure 2

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Legend

 Project Site



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Existing Site Photos



Key



Viewpoint location



Direction of sight

View of existing driveway on Glassell Street and the abandoned rail spur along the Project's southern boundary.

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Existing Site Photos



Key



Viewpoint location



Direction of sight

View of the Project site from Fletcher Avenue.

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Existing Site Photos



Key
● Viewpoint location
→ Direction of sight

View of the adjacent active railway from Fletcher Avenue.

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Existing Site Photos



Key



Viewpoint location



Direction of sight

View of the Project site from Glassell Street.

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Existing General Plan Designation



Legend

Project Site

General Plan Land Use

LDR - Low Density Residential

LMDR - Low Medium Residential

MDR - Medium Density Residential

LI - Light Industrial

PFI - Public Facilities and Institutions

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[illegible]

 Project Site

 Single Family Res. 12000 sq ft
  Single Family Res. 10000 sq ft
 Residential Duplex 6000 sq ft Single Story Overlay
  Residential Multiple Family

 Office Professional

 Limited Business

 Light Manufacturing

 Industrial Manufacturing

Public Institution

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PROJECT DESCRIPTION

Project Overview:

Rexford Industrial Realty (Project Applicant) is requesting approval from the City of Orange for a Conditional Use Permit, Major Site Plan Review, Design Review, Lot Line Adjustment, and Tree Removal Permit in order to construct and operate an industrial building on APNs 374-381-01 and 374-381-02. The Project would demolish the existing three buildings on-site and redevelop the site with a one-story (plus mezzanine), 298,988 SF industrial building with manufacturing and warehousing uses. The proposed building would result in a FAR of 0.57. Additional improvements would include landscaping, utility connections, stormwater facilities, and fencing, as well as pavement of parking areas, loading areas, and driveways. Figure 7, *Conceptual Site Plan*, illustrates the proposed site plan.

Project Features:

Building Summary and Architecture

The proposed industrial building would be single-story plus mezzanine and approximately 45 feet in height and contain industrial warehouse and manufacturing uses. The building would be setback approximately 88 feet from Glassell Street and 18 feet from Fletcher Avenue.

The proposed building has been designed to accommodate two different use configurations depending on the needs of future tenants. Option 1 (analyzed Project) would total 298,988 SF. Option 1 would include approximately 171,188 SF of warehouse space on the ground floor, 109,000 SF of manufacturing space on the ground floor, 9,400 SF of office space on the ground floor, and 9,400 SF of additional office space on the mezzanine level.

Option 2 would have the same building footprint as Option 1, but would total 298,918 SF. Option 2 would include 260,118 SF of warehouse space on the ground floor, 20,000 SF of manufacturing space on the ground floor, 9,400 SF of office space on the ground floor, and 9,400 SF of additional office space on the mezzanine level.

The analyzed configuration is Option 1 with 109,000 SF of manufacturing use, which duly represents the most conservative analysis since manufacturing use is generally more intensive of use than warehouse use in terms of trip generation and air quality impacts. Any differences in potential environmental impacts between the Option 1 and Option 2 are identified throughout the analysis below.

As shown in Figure 8, *Elevations*, the analyzed Project would establish an architectural presence through emphasis on building finish materials and consistent material usage and color scheme. The proposed concrete tilt-up building would be grey and white with grey windows, wooden slats, and black storefront framing.

Parking and Loading Summary

The analyzed Project would provide a total of 380 parking stalls, including 297 standard stalls, 5 accessible stalls, 2 van accessible stalls, and 76 standard and accessible electric vehicle (EV) stalls. The parking stalls for passenger vehicles would be provided in a surface lot along the Project site's western, eastern, and southern boundaries. Additional parking stalls would be provided in a surface lot on the southern side of the building. The analyzed Project would include a total of five raised dock doors; all located on the southern side of the

building. The parking summary for the analyzed Project is shown below in Table 2, *Analyzed Project Parking Summary*. Proposed parking and loading docks are shown in Figure 7, *Conceptual Site Plan*.

In addition, up to 14 short-term bicycle parking spaces would be provided near the office entrance on the south side of the building and 6 long-term bicycle parking spaces would be provided near the electric room on the west side of the building for a total of 20 bicycle parking spaces.

Table 2: Parking Summary for Option 1 (Analyzed Project)

Parking Type	Number Provided
Standard Stalls	297
Accessible Stalls	5
Van Accessible Stalls	2
EV Capable Stalls	76
Total	380
Loading Dock Doors	5

Option 2 would provide a total of 247 parking stalls, including 190 standard stalls, 5 accessible stalls, 2 van accessible stalls, and 50 standard and accessible EV stalls. Warehouse use generally requires less employee parking accommodation than manufacturing use, as reflected by City parking requirements. Under Option 2, 133 parking stalls for passenger vehicles would be removed from the southern parking area. Option 2 would increase dock doors to provide a total of 36 raised dock doors and two grade level doors, all located on the southern side of the building. Table 3, *Parking Summary for Option 2*, below presents the parking summary for Option 2. Proposed parking and loading docks are shown in Figure 9, *Conceptual Site Plan for Option 2*.

Table 3: Parking Summary for Option 2

Parking Type	Number Provided
Standard Stalls	190
Accessible Stalls	5
Van Accessible Stalls	2
EV Capable Stalls	50
Total	247
Loading Dock Doors	36

Landscaping and Fencing

The analyzed Project would include approximately 65,137 SF of ornamental landscaping that would cover approximately 12.4 percent of the site, as shown in Figure 10, *Landscape Plan*. Parking lot landscaping would include perimeter planters, planters abutting parking lots and drive aisles, and tree planting for parking shade. Proposed landscaping would include 36-inch and 24-inch box trees and various shrubs and succulents to screen the proposed building and parking from off-site viewpoints. Landscaping would be consistent under Option 2.

The truck court to the south of the building would be screened with an 8-foot-tall screen wall and two 8-foot-tall steel sliding gates for access, one at the east entrance and one at the west entrance. Additionally, an 8-foot-tall tube steel fence would be located along the western boundary of the site and along the remaining southern boundary of the site to the east and west of the screen wall. A sliding metal gate is proposed on the Project driveway along the eastern boundary of the Project site. Knox padlocks would be provided for all gates.

Access and Circulation

Access to the analyzed Project would be provided via two proposed driveways from Glassell Street on the western boundary of the site. The northern driveway on Glassell Street would be 30-foot-wide and would be limited to passenger vehicle access. The southern driveway on Glassell Street would be 49-feet wide and allow both truck and passenger vehicle access. Both driveways would provide ingress and egress to the Project site. Internal circulation would be via a 28-foot-wide driving aisle, which doubles as the fire lane. Fire department access would be provided via a 28-foot-wide driveway on Fletcher Avenue in the northeast corner of the site. Proposed circulation and access would be consistent under Option 2.

Infrastructure Improvements

Water and Sewer Improvements

The Project would install a new 12-inch City distribution water line and four fire hydrants in Fletcher Avenue and tie over existing water lines on Heatherside Street and Beechwood Street. A quitclaim deed is required for the relinquish of the on-site waterline easement.

The Project would also install new on-site connections to the existing 12-inch sewer line in Glassell Street as well as private fire loop along the building perimeter.

Work within Fletcher Avenue, a pavement moratorium area or areas with a Pavement Condition Index (PCI) score of 75 or greater shall require the pavement to be repaired with the following criteria: For asphalt concrete pavement, the limits of grind and overlay area for the excavation shall be full lane width from striping to striping (or from striping to concrete gutter). The lane extent of the grind and overlay area shall be 10 feet of the street length in both directions. If the trench crosses more than one lane, the limits of grind and overlay shall be the entire lane width of the number of lanes the trench impacts. When multiple excavations (potholes, trenches, etc.) are made within 100 feet or less, the pavement grind and overlay limits shall be one continuous patch, inclusive of areas between the excavations. (Public Works Standard No. 125 – Note 17).

Drainage Improvements

The Project would install an underground stormwater infiltration system in the southwest corner of the site to collect, treat, and infiltrate stormwater. Discharge from the underground infiltration system would be routed to the 30-inch storm drain line that is on-site and continues down Glassell Street.

Street Improvements

Street improvements and sidewalk, curb, and gutter improvements along the Project's fronting streets. The analyzed Project would maintain the existing 7.9-foot-wide sidewalk along Glassell Street and the existing curb and gutter along Fletcher Avenue. A pedestrian walkway would be installed connecting the office area with Glassell Street.

All proposed utility improvements would be consistent under Option 2.

Construction:

Construction activities for the analyzed Project would occur over one phase and would include demolition, site preparation, grading, building construction, paving, and architectural coating. Demolition activities are expected to generate approximately 2,600 tons of debris. The Project is expected to result in the import of approximately 2,200 cubic yards of soil during the grading phase. No soil export is anticipated to occur during construction. Construction is expected to occur six days per week for 10 hours per day. Construction would occur over a duration of 17 months, as shown in Table 4, *Construction Schedule*. Construction would occur within the hours allowed by the City of Orange Municipal Code Section 8.24.050, which states that construction shall occur only between the hours of 7:00 a.m. and 8:00 p.m. Monday through Saturday, and from 9:00 a.m. to 8:00 p.m. on Sundays and federal holidays. Construction activities and schedule would be consistent under Option 2.

Table 4: Construction Schedule

Construction Activity	Number of Days
Demolition	75
Site Preparation	10
Grading	30
Building Construction	300
Paving	20
Architectural Coatings	10
Total	445

Operations:

The Project would operate as an industrial building with manufacturing and warehouse uses. The proposed building would be designed to Leadership in Energy and Environmental Design (LEED) Gold Standards. Cold storage is not proposed. Typical operational characteristics would include employees traveling to and from the site and trucks arriving at the site to load and unload cargo. Operations are anticipated to be 24 hours a day, seven days a week under the analyzed Project and Option 2. It is assumed that the analyzed Project would be operational by the year 2027.

City of Orange Discretionary Actions:

The following discretionary approval, permits, and studies are anticipated to be necessary for the implementation of the analyzed Project:

- Conditional Use Permit No. 25-0013
- Major Site Plan Review No. 1180
- Design Review No. 5154
- Lot Line Adjustment No. 2025-03
- Tree Removal Permit
- Adoption of Mitigated Negative Declaration No. 25-0002

- Ministerial approvals and permits necessary to execute the analyzed Project, including but not limited to, grading permit, building permit, etc.

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

- South Coast Air Quality Management District

Scheduled Public Meetings or Hearings:

This Initial Study/Mitigated Negative Declaration (MND) will be considered for adoption, along with approval of the Project's entitlements and schematic design plans, at a noticed public hearing, which will be scheduled and noticed at a later date.

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Conceptual Site Plan



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Elevations



PROPOSED NORTH ELEVATION



PROPOSED WEST ELEVATION



PROPOSED SOUTH ELEVATION



PROPOSED EAST ELEVATION



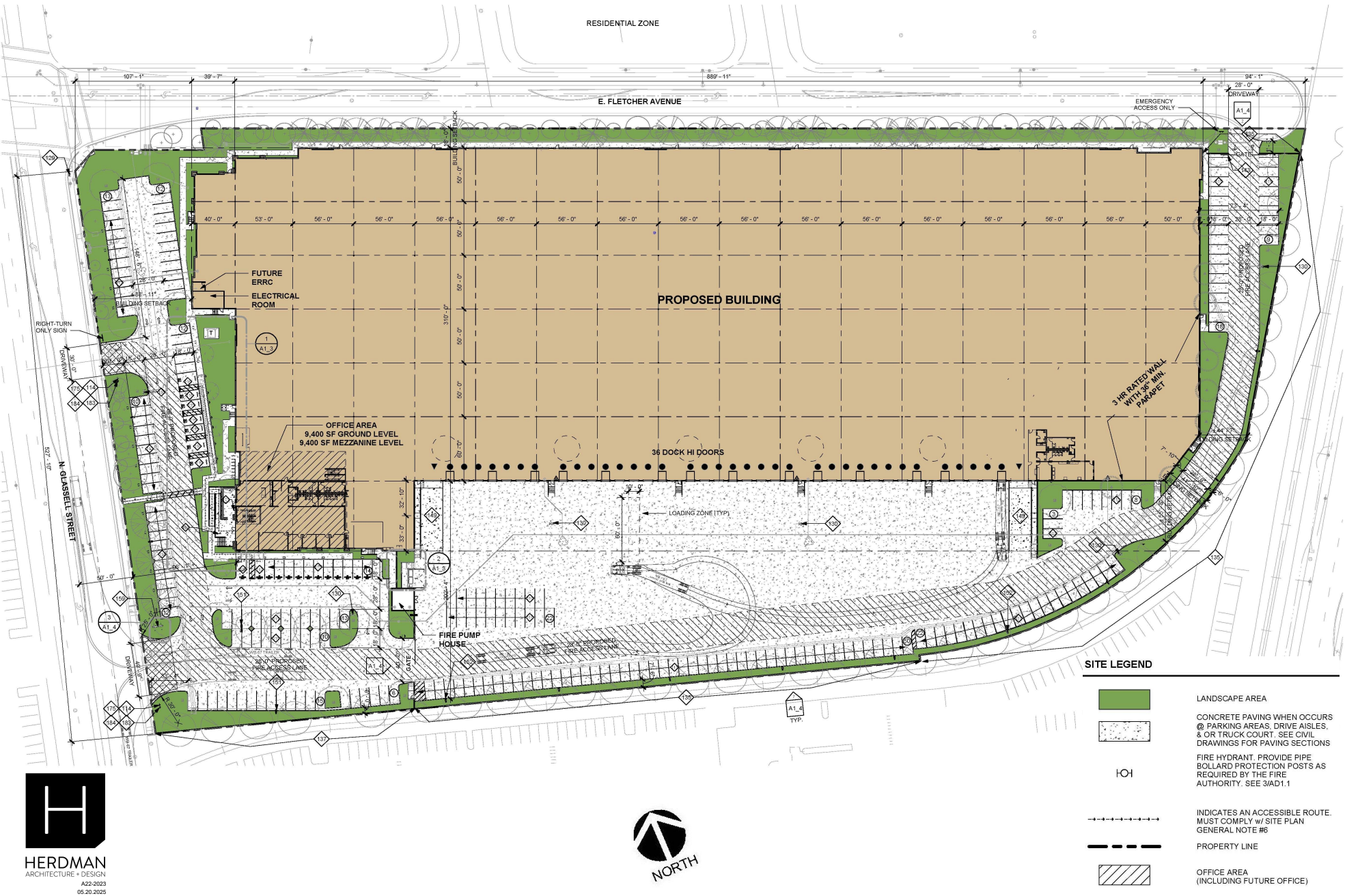
HERDMAN
ARCHITECTURE + DESIGN

2411 N. Glassell Street
City of Orange

Figure 8

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Conceptual Site Plan for Option 2



HERDMAN
ARCHITECTURE + DESIGN
A22-2023
05.20.2025



2411 N. Glassell Street
City of Orange

Figure 9

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Landscape Plan



LEGEND

Hydrazone	Key	Water Use	Exposure	Irrigation Type
HZ-1		Low	Sun	Tree Bubbler
HZ-2		Mod	Sun	Tree Bubbler
HZ-3		Low	Sun	Low Volume Spray (Rainbird)
HZ-4		Low	Shade	Low Volume Spray (Rainbird)
HZ-5		Low	Sun	Low Volume Spray (Hunter IV)
HZ-6		Low	Shade	Low Volume Spray (Hunter IV)
HZ-7		Low	Sun	Drip

TREE PROTECTION AND REPLACEMENT COMPLIANCE

1. PRIOR TO PROJECT APPROVAL THE DEVELOPER SHALL RETAIN A CITY-APPROVED BIOLOGIST OR ARBORIST TO PREPARE A TREE PROTECTION, REPLACEMENT, AND MONITORING PROGRAM CONFORMING TO THE CITY MUNICIPAL CODE.
2. TREE PROTECTION SHALL CONFORM TO A TREE SURVEY REPORT IDENTIFYING SIZE, SPECIES, AND HEALTH CONDITION OF EXISTING TREES TO BE PROTECTED IN PLACE, TRIMMED AND/OR PRUNED, AND THOSE TO BE REMOVED.
3. A FINAL REPORT SHALL INCLUDE THE FINAL NUMBER OF REPLACEMENT TREES PER THE CITY'S REPLACEMENT RATIO.
4. THE DEVELOPER SHALL SUBMIT A COPY OF THE BUILDING AND GRADING PLANS FOR CITY REVIEW PRIOR TO THE ISSUANCE OF BUILDING OR GRADING PERMITS.
5. CITY SHALL APPROVE THE MONITORING PROGRAM AND SHALL CONDUCT SITE INSPECTIONS FOR ALL DEVELOPMENT PHASES ASSURING COMPLIANCE.

PLANT PALETTE

(Sunset Zone 24)

Symbol	Botanical Name	Common Name	Quant.	SEE	WUCOLS (Region 3)
	<i>Cercis canadensis</i>	Forest Pansy	8	36" Box	Low
	<i>Kodivertia paniculata</i>	Golden Rain Tree	26	36" Box	Low
	<i>Podocarpus gracilar</i>	Fern Podocarpus	3.7	24" Box	Mod
	<i>Laurus nobilis</i>	Saratoga Sweet Bay	8	24" Box	Low
	<i>Pinus halepensis</i>	Allepia Pine	20	24" Box	Low
	<i>Platanus mexicana</i>	Mexican Sycamore	3	36" Box	Mod
	Existing Pine Trees to Remain				

Symbol	Botanical Name	Common Name	Size	WUCOLS (Region 3)
	SHRUBS/ GROUNDCOVERS			
	<i>Agave Blue Flame</i>	Blue Flame Agave	5 gal.	Low
	<i>Baccharis pilularis</i>	Coyote Bush	1 gal.	Low
	<i>Bulbine frutescens</i>	Staked Bulbine	5 gal.	Low
	<i>Bougainvillea Monita</i>	COOLA Bougainvillea	5 gal.	Low
	<i>Calandrinia s. Shinning Pink</i>	Shining Pink Rock Purslane	5 gal.	Low
	<i>Callistemon viminalis</i>	Dwarf Bottlebrush	5 gal.	Low
	<i>Celtis purpurea</i>	Orchid Rock Rose	5 gal.	Low
	<i>Delosperma cooperi</i>	Cooper's Hardy Ice Plant	1 gal.	Low
	<i>Ostea vegeta</i>	Fairlight Lily	5 gal.	Low
	<i>Eranthis m. Valantini</i>	Valentine's Emu Bush	5 gal.	Low
	<i>Festuca Eliza Blue</i>	Eliza Blue Fescue	5 gal.	Low
	<i>Hesperaloe parviflora</i>	Red Yucca	5 gal.	Low
	<i>Hesperaloe p. Yellow</i>	Yellow Yucca	5 gal.	Low
	<i>Lantana Sunburst</i>	Sunburst Lantana	1 gal.	Low
	<i>Lavandula s. Arno</i>	Spanish Lavender	5 gal.	Low
	<i>Leucadendron Safari Sunset</i>	Safari Sunset Conebush	5 gal.	Low
	<i>Muhlenbergia capillaris</i>	Pink Muhly	5 gal.	Low
	<i>Rosemarinus o. Huntington Cape</i>	Creeping Rosemary	1 gal.	Low
	<i>Ruellia equisetifolia</i>	Coral Fountain	5 gal.	Mod
	<i>Salvia greggii</i>	Furnace's Red Autumn Sage	5 gal.	Low
	<i>Salvia leucantha</i>	Mexican Bush Sage	5 gal.	Low
	<i>Senecio mandraliscae</i>	Blue Chalk Sticks	1 gal.	Low
	<i>Yucca f. Color Guard</i>	Color Guard Yucca	5 gal.	Low

SCREEN/ FOUNDATION SHRUBS

	<i>Leucophyllum f. Compacta</i>	Texas Ranger	5 gal.	Low
	<i>Prunus caroliniana Compacta</i>	Compact Cherry Laurel	5 gal.	Mod
	<i>Wisteria Blue Gem</i>	Blue Gem Coast Rosemary	5 gal.	Low

NOTES:

PLANT MATERIAL NOT USED MAY BE USED, SUBJECT TO APPROVAL BY THE CITY.
ALL LANDSCAPE PLANS AND INSTALLATIONS SHALL ADHERE TO CITY DESIGN GUIDELINES, CODES AND REGULATIONS.
ALL LANDSCAPE AREAS SHALL RECEIVE AUTOMATIC IRRIGATION SYSTEM.
ALL LANDSCAPE INSTALLATION SHALL BE PERMANENTLY MAINTAINED BY OWNER.
EXISTING TREE(S) PROTECTION, REMOVAL AND REPLACEMENT PER ARBORIST REPORT SEE NOTES AND TABULATION

WATER CONSERVATION STATEMENT

ALL PLANT MATERIAL SELECTED FOR THIS SITE WERE APPROPRIATE FOR THE GEOGRAPHICAL LOCATION AND LOCAL CLIMATE, THEIR ADAPTABILITY TO DROUGHT. DATA FROM WUCOLS III HAS BEEN USED FOR DETERMINING SPECIES PLANT FACTOR FOR THE WATER USE CALCULATIONS.

PLANTS WITH SIMILAR WATER USE REQUIREMENTS WERE GROUPED TOGETHER.

MORE THAN 80% OF THE LANDSCAPE AREAS ARE PLANTED WITH LOW WATER USE PLANTS, THE BALANCE WITH MODERATE WATER USE PLANTS. NO HIGH WATER USE PLANTS ARE USED.

IRRIGATION SECTIONS/ HYDRAZONES ARE SEPARATED BY CONSIDERING PLANT SPECIES FACTOR, PLANT DENSITY AND MICROCLIMATES. IF LOW WATER USE PLANTS ARE MIXED WITH MODERATE WATER USE PLANTS IN THE SAME HYDRAZONE, THE MODERATE WATER USE FACTOR IS USED FOR WATER USE CALCULATIONS. SEE HYDROZONE EXHIBIT TABLE.

THE IRRIGATION SYSTEM UTILIZED LOW VOLUME DISTRIBUTION SYSTEM WITH A MASTER VALVE, FLOW SENSOR, CHECK VALVES, ET BASED AUTOMATIC CONTROLLERS WITH CYCLE+SOAK AND WATER BUDGETING CAPABILITY WEATHER STATION, RAIN SHUT-OFF.

ALL TREE AND GROUND COVER AREAS WILL BE DRESSED WITH 3" LAYER OF MULCH MOISTURE RETENTION AND TO DISCOURAGE WEEDS.

PLANTING AND IRRIGATION PLANS COMPLY WITH THE STANDARDS SET FORTH IN LOCAL MUNICIPAL CODE AND WATER CONSERVATION ORDINANCE.

THE USE OF TURF IS ELIMINATED.



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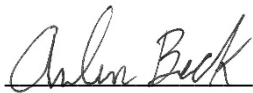
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION. On the basis of this initial evaluation:

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



Arlen Beck, Senior Planner

04-09-2026

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”. The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from earlier analyses may be cross-referenced, as discussed below).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated”, describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

CHECKLIST OF ENVIRONMENTAL IMPACT ISSUES

1. AESTHETICS.		Less than Significant			
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>		Potentially Significant Impact	With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning or other regulations governing scenic quality?	☐	☐	☒	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

a) The Project would not have a substantial adverse effect on a scenic vista.

Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Important factors in determining whether the Project would block scenic vistas include the Project’s proposed height, mass, and location relative to surrounding land uses and travel corridors.

The Orange General Plan defines scenic vistas as those “...hillsides, ridgelines or open space areas that provide a unifying visual backdrop to the urban environment.” The Project site is in an urbanized area and is surrounded by residential, industrial, and commercial development. Distant views of the surrounding foothills from public vantage points on Glassell Street and Fletcher Avenue are obstructed by existing development.

The Project would develop an industrial building that would be set back from the adjacent streets and would not encroach into the existing public long-distance views. The proposed building would have a maximum height of 45 feet, consistent with City of Orange Municipal Code Section 17.20.080, *Building Height*. The Project would be set back approximately 88 feet from Glassell Street and 18 feet from Fletcher Avenue, which exceed the setback requirements per City of Orange Municipal Code 17.20.090, *Yard Requirements*. Thus, the analyzed Project would not impede long-range views of the surrounding foothills from public vantage points along Glassell Street and Fletcher Avenue. Additionally, the Project is consistent with surrounding uses

and the City's development standards. Therefore, the analyzed Project would not alter any scenic vistas or protected viewsheds, and there would be no impact.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

There are no officially designated State scenic highways in the vicinity of the Project site (California Department of Transportation, 2019). The nearest officially designated scenic highway is SR 91, approximately 1.8 miles northeast of the Project site (California Department of Transportation, 2019). The Orange General Plan identifies portions of Santiago Canyon Road, Jamboree Road, and Newport Boulevard as potential City scenic highways. However, these routes are not located within the vicinity of the Project site. Therefore, impacts to scenic resources within a State scenic highway would not occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

c) The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

The Project site is located in an urban area and is surrounded by residential, commercial, and industrial uses. The site is currently developed with three office buildings. The existing character of the Project site is neither unique nor of special aesthetic value or quality. Temporary changes to the visual character from construction activities, including construction equipment and staging would be short-term and would change as construction proceeds.

The Project site has an existing General Plan land use designation of Light Industrial (LI) and is zoned Industrial Manufacturing (M-2). The Project would be consistent with the existing land use designation and zoning. According to Section 17.13.030 of the City's Municipal Code warehousing/ manufacturing uses are permitted uses in the M-2 zone. According to the City's General Plan, the Light Industrial designation "allows for manufacturing, processing, and distribution of goods. Wholesale activities associated with industrial operations, as well as small-scale, support retail, service commercial and office uses may also be established in areas with ready access to major circulation routes. A 3-story building height limit applies within Light Industrial designated areas." Table AES-1, *Project Consistency with Site Development Standards*, shows the Project's consistency with the applicable M-2 zoning development standards from Chapter 17.20 of the City's Municipal Code.

Table AES-1: Project Consistency with Site Development Standards

Development Feature	M-2 Zoning Requirement	Project Consistency
Exterior Front, Side, Rear Setbacks: Adjacent to alley or Residential Adjacent to Arterial Street Adjacent to Local Street Interior Side and Rear Setbacks	20 ft 20 ft 10 ft 0 ft	Consistent. The Project would be set back approximately 88 feet from Glassell Street (arterial street) and 18 feet from Fletcher Avenue (local street).
Maximum Height: Within 50 Feet of Residential Districts All Other Locations	20 ft 45 ft	Consistent. The proposed building would be located more than 50 feet from the residential uses to the north and east. The Project would have a maximum height of 45 feet.
Landscaping	Requirements listed in the Landscape Standards and Specifications	Consistent. The Project includes 65,137 SF of landscaping. The Project would adhere to all landscaping requirements in the City included in the Landscape Standards and Specifications.
Maximum Floor Area Ratio (FAR)	1.0	Consistent. The Project would have a FAR of 0.57.

As shown in Table AES-1, the Project would comply with the M-2 development standards. In addition, the Project would be compatible with surrounding urban uses that include industrial, commercial, and residential developments. Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality and would not degrade the visual character or quality of the site or surrounding area. Impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

d) The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The Project site is located within a developed urban area and is surrounded by residential, commercial, and industrial uses. Existing sources of light in the vicinity of the Project site include streetlights, security lighting, landscape lighting, and lighting from building interiors that pass-through windows.

The Project has the potential to create a new source of substantial lighting or glare during construction that could adversely affect nighttime views at adjacent residences. However, lighting on the Project site would be designed, located, and shielded in compliance with the City's Municipal Code Section 17.12.030, *Lighting*. Proposed changes to lighting would be verified by the Orange Police Crime Prevention Bureau during the permitting process. Therefore, the increase in light that would be generated by the Project would not adversely affect day or nighttime views in the area. Overall, lighting impacts would be less than significant.

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. Generally, dark or mirrored glass would have a higher visible light reflectance than clear glass. Buildings constructed of highly reflective materials from which the sun reflects at a low angle can cause adverse glare. The Project would use gray reflective glazing on portions of the north and south elevations. Pursuant to the City's Municipal Code Section 17.12.030, included as Plan, Program, or Policy (PPP) AES-1, exterior lighting would be shielded or oriented to prevent glare beyond the exterior boundaries of the property. With compliance with City regulations, the Project would not generate substantial sources of glare, and impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

Existing Plans, Programs, or Policies

PPP AES-1: Exterior Lighting. Exterior lighting on the Project site shall conform to the regulations within Municipal Code Section 17.12.030. Lighting on any premises shall be directed, controlled, screened or shaded in such a manner as not to shine directly on surrounding premises.

2. AGRICULTURE AND FOREST RESOURCES.

(In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.) In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.)

Would the project:

	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Impact Analysis:

a) The Project would not 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.

The Project site is located in an urbanized area, devoid of agricultural uses. The Project site is currently developed with three buildings, a paved lot, and ornamental landscaping. The California Department of Conservation Farmland Mapping and Monitoring Program identifies the Project site and surrounding areas as Urban and Built-Up land (California Department of Conservation, 2022). No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by the Project or converted to a non-agricultural use. Thus, no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not conflict with existing zoning for agricultural use or a Williamson Act contract.

As described in the previous response, the Project site area is devoid of any agricultural uses. The Project site has a zoning designation of Industrial Manufacturing and is also surrounded by areas zoned and developed for industrial, commercial, and residential uses. As discussed in the City of Orange General Plan Program EIR, no land within the City of Orange is under a Williamson Act contract. Therefore, implementation of the Project would not conflict with existing agricultural zoning or a Williamson Act contract, and no impact would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

c) The Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

The Project site is currently developed and is located in an area that is completely developed with urban uses. The Project site and vicinity are void of forest land or timberland. In addition, the Project site has a land use designation of Light Industrial (LI) and a zoning designation of Industrial Manufacturing (M-2). The surrounding areas are zoned for industrial, commercial and residential uses. Therefore, development of the Project would not conflict with forest land, timberland, or zoning for forest or timberland use and no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

d) The Project would not result in the loss of forest land or conversion of forest land to non-forest use.

As described in the previous response, the Project site area is devoid of any forest land and is not zoned for forest uses. Thus, development of the Project would not result in the loss of forest land or conversion of forest land to non-forest uses and no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

e) The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

As described in the previous responses, the Project site does not include and is not near any farmland or forest land or land zoned for either farm or forest uses. No other changes to the existing environment would occur from implementation of the Project that could result in the conversion of farmland to non-agricultural use or forest land to non-forest use. Thus, no impact would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

3. AIR QUALITY.

(Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.)

Would the project:

		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Energy, and Greenhouse Gas Impact Analysis prepared by EPD Solutions, Inc. in April 2026 (included as Appendix A) as well as the Health Risk Assessment prepared by EPD Solutions, Inc. in April 2026 (included as Appendix B).

Impact Analysis:

a) The Project would not conflict with or obstruct implementation of the air quality management plan (AQMP).

The Project site is located in the South Coast Air Basin (SCAB) and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the AQMP, which addresses federal and State Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the SCAB. In preparation of the AQMP, the SCAQMD and SCAG use regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. For purposes of analyzing consistency with the AQMP, if a project would result in growth that is substantially greater than what was anticipated, then the project would conflict with the AQMP. Alternatively, if a project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans (Consistency Criterion 1). In addition, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation (Consistency Criterion 2).

The SCAB is in a non-attainment status for federal ozone standards, and State and federal particulate matter standards. The SCAB has a maintenance status for federal PM₁₀ standards. Any development in the SCAB, including the analyzed Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the analyzed Project exceed these thresholds, a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

The Project site has a City of Orange General Plan land use designation of Light Industrial (LI) and is zoned as Industrial Manufacturing (M-2). The Project proposes an industrial building, consistent with the land use and zoning designation of the site. Additionally, based on the size of the Project, it is anticipated that the employment base for both the construction and operational phases of the analyzed Project would come from the existing population in the region. Thus, the analyzed Project would not induce population growth or growth in the area. Therefore, implementation of the Project would not exceed the growth assumptions for the Project site. As a result, the analyzed Project would be consistent with Criterion 1.

As discussed below, the emissions generated by the construction and operation of the analyzed Project would not exceed applicable SCAQMD regional thresholds, and the Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. As such, the analyzed Project would be consistent with Consistency Criterion No. 2. Therefore, impacts related to conflict with the AQMP from the analyzed Project would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not 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.

The SCAB is in non-attainment status for federal ozone standards, and State and federal particulate matter standards. The SCAB is designated as a maintenance area for federal PM₁₀ standards. Any development in the SCAB, including the analyzed Project, could cumulatively contribute to these pollutant violations. Evaluation of the cumulative air quality impacts of the analyzed Project has been completed pursuant to the SCAQMD's cumulative air quality impact methodology. The SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM₁₀, and PM_{2.5}) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. The SCAQMD has established daily mass thresholds for regional pollutant emissions, listed in Table AQ-1.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Maximum Daily Emissions (lbs/day)	
	Construction	Operations
ROG	75	55
NOx	100	55
CO	550	550
PM ₁₀	150	150
PM _{2.5}	55	55
SOx	150	150

Notes: lbs/day = pounds per day; ROG = reactive organic gases; NOx = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter; SOx = sulfur oxides
Source: Appendix A

Construction

Construction activities associated with the analyzed Project are expected to occur over 17 months and would generate pollutant emissions from the following: (1) demolition, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coating. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 Fugitive Dust for controlling fugitive dust and PM₁₀ and PM_{2.5} emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas.

Compliance with SCAQMD Rule 403 Fugitive Dust, included as PPP AQ-1, was accounted for in the construction emissions modeling. In addition, implementation of SCAQMD Rule 1113 Architectural Coatings, included as PPP AQ-2, which governs the volatile organic compounds (VOC) content in architectural coating, paint, thinners, and solvents was accounted for in construction emissions modeling. As shown in Table AQ-2, the California Emissions Estimator Model (CalEEMod) Version 2022.1 results indicate that construction emissions generated by the analyzed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less-than-significant impact.

Table AQ-2: Regional Construction Emission Estimates

Construction Activity	Maximum Daily Regional Emissions (lbs/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
2025						
Demolition ¹	3.1	28.5	26.2	<0.1	2.2	1.2
Site Preparation	5.1	46.9	41.5	0.1	9.7	5.6
Grading	4.5	41.6	38.1	0.1	5.7	3.1
Building Construction	2.0	16.3	24.6	<0.1	2.7	1.0
Maximum Daily Emissions - 2025	5.1	46.9	41.5	0.1	9.7	5.6
2026						
Building Construction	1.9	15.4	25.0	<0.1	2.6	1.0
Paving	1.5	9.0	13.1	<0.1	0.6	0.4
Architectural Coating	70.8	1.5	3.0	<0.1	0.4	0.1
Maximum Daily Emissions - 2026	70.8	15.4	25.0	<0.1	2.6	1.0
2027						
Architectural Coating	70.8	1.5	2.9	<0.1	0.4	0.1
Maximum Daily Emissions - 2027	70.8	1.5	2.9	<0.1	0.4	0.1
Maximum Daily Emissions 2025-2027	70.8	46.9	41.5	0.1	9.7	5.6
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: lbs/day = pounds per day; ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter; SCAQMD = South Coast Air Quality Management District

¹ The demolition phase includes emissions from rock crushing.

Source: Appendix A

Operation

Implementation of the analyzed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. Operation of the analyzed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. The analyzed Project would generate 843 daily trips including 106 trips during the AM peak hour and 115 trips during the PM peak hour according to the Traffic Impact Analysis prepared for the Project (Appendix L). Area source emissions would occur from the operation of the industrial building.

Operational emissions associated with the analyzed Project were modeled using CalEEMod Version 2022.1 land use emission model and compared to the SCAQMD operational emissions thresholds. Emissions associated with operation of the analyzed Project are presented in Table AQ-3. As shown, the analyzed Project would result in long-term regional emissions of criteria pollutants below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the National Ambient Air Quality

Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) and would not result in a cumulatively considerable net increase of any criteria pollutant. Impacts would be less than significant.

Table AQ-3: Regional Operational Emission Estimates

Operational Activity	Maximum Daily Regional Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	2.3	15.3	25.5	0.2	9.4	2.6
Area	9.3	0.1	13.0	<0.1	<0.1	<0.1
Energy	0.1	2.2	1.9	<0.1	0.2	0.2
Off-Road	<0.1	33.1	330.4	<0.1	<0.1	<0.1
Stationary	0.4	1.1	1.0	<0.1	0.1	0.1
Total Project Operational Emissions	12.1	51.8	371.8	0.2	9.7	2.8
Existing Use Operational Emissions	13.7	9.9	69.4	0.2	15.2	4.1
Net New Emissions	-1.5	41.9	302.4	<0.1	-5.5	-1.3
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: lbs/day = pounds per day; ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter; SCAQMD = South Coast Air Quality Management District
Source: Appendix A

Option 2 includes 260,118 SF of warehouse space and 20,000 SF of manufacturing space. The manufacturing uses under Option 2 are less than the 109,000 SF of manufacturing uses under the analyzed Project. Manufacturing uses are generally more intensive than warehouse uses and are anticipated to result in more trips and associated emissions than warehouse uses. As a result, Option 2 is anticipated to result in lesser criteria pollutant emissions than the analyzed Project. Further, Option 2 would also result in long-term regional emissions of criteria pollutants below the SCAQMD's applicable thresholds. Therefore, operational emissions from Option 2 would not exceed the NAAQS and CAAQS and would not result in a cumulatively considerable net increase of any criteria pollutant. Impacts from Option 2 would be less than significant, consistent with the analyzed Project.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) The Project would not expose sensitive receptors to substantial pollutant concentrations.

Localized Significance Analysis

The SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD, 2008) recommends the evaluation of localized NO_x, CO, PM₁₀, and PM_{2.5} construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold

(LST) analysis. According to the SCAQMD's *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs" (SCAQMD, 2008). SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NO_x, CO, PM₁₀, and PM_{2.5} pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project is located within SRA 17, Central Orange County.

Sensitive receptors can include residences, schools, playgrounds, childcare centers, elderly care centers, and hospitals. The nearest sensitive receptors are residences, located approximately 16.54 meters (54 feet) north of the Project site's fence line along the northern boundary. As the nearest residences are located approximately 16.54 meters (54 feet) from the Project site, the minimum (most stringent) 25-meter receptor distance is used for evaluation of localized impacts to provide a conservative analysis.

Construction. Construction of the analyzed Project may expose nearby residential sensitive receptors to airborne particulates as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD's standard construction practices Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Additionally, as shown in Table AQ-4, Project construction emissions would not exceed SCAQMD LSTs. Therefore, impacts would be less than significant.

Table AQ-4: Localized Construction Emissions Summary

Construction Activity	Maximum Daily Localized Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
2025				
Demolition ¹	27.7	24.9	1.8	1.1
Site Preparation	46.8	40.5	9.5	5.6
Grading	40.7	36.8	5.2	3.0
Building Construction	14.1	17.7	0.6	0.5
Maximum Daily Emissions - 2025	46.8	40.5	9.5	5.6
2026				
Building Construction	13.3	17.6	0.5	0.5
Paving	8.9	12.4	0.4	0.4
Architectural Coating	1.4	1.9	<0.1	<0.1
Maximum Daily Emissions - 2026	13.3	17.6	0.5	0.5
2027				
Architectural Coating	1.4	1.9	<0.1	<0.1
Maximum Daily Emissions - 2027	1.4	1.9	<0.1	<0.1
Maximum Daily Emissions 2025-2027	46.8	40.5	9.5	5.6
SCAQMD Localized Significance Thresholds	160.3	1,073.7	10.7	6
Threshold Exceeded?	No	No	No	No

Notes: lbs/day = pounds per day; NO_x = nitrogen oxides, CO = carbon monoxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter;

SCAQMD = South Coast Air Quality Management District

¹The demolition phase includes emissions from rock crushing.

Source: Appendix A

Operation. According to the SCAQMD LST methodology, LSTs apply to Project operational stationary and on-site mobile sources. The analyzed Project includes an industrial building that would involve vehicles idling or queueing for extended periods. Table AQ-5 lists the localized operational emissions summary for the analyzed Project.

Table AQ-5: Localized Operational Emissions Summary

Operational Activity	Maximum Daily Localized Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Mobile	5.2	4.0	2.1	0.6
Area	0.1	13.0	<0.1	<0.1
Energy	2.2	1.9	0.2	0.2
Off-Road	33.1	330.4	<0.1	<0.1
Stationary	1.1	1.0	0.1	0.1
Total Emissions	41.8	350.3	2.4	0.9
SCAQMD Localized Significance Thresholds	183	1,253	3	2
Threshold Exceeded?	No	No	No	No

Notes: lbs/day = pounds per day; NO_x = nitrogen oxides, CO = carbon monoxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter; SCAQMD = South Coast Air Quality Management District

Source: Appendix A

As shown, Project construction and operational emissions would not exceed the applicable SCAQMD LSTs for any criteria pollutant. Thus, implementation of the Project would result in a less-than-significant localized air quality impact.

Construction and Operational Diesel Health Risk Assessment

A Health Risk Assessment (HRA), included in Appendix B, was prepared to evaluate the health risk impacts as a result of exposure to diesel particulate matter (DPM) from the heavy-duty diesel vehicles and off-road construction equipment that would be utilized for the construction of the Project on a day-to-day basis. DPM has been identified by the California Air Resources Board (CARB) as a carcinogenic substance responsible for nearly 70 percent of the airborne cancer risk in California. The estimated health risk impacts were compared to the health risk significance thresholds recommended by the SCAQMD.

The SCAQMD recommends using a risk level of 10 in one million as the cancer risk threshold. A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. Non-cancer health risks are conveyed in terms of the Hazard Index (HI). A ratio of the predicted concentration of the facility's reported toxic air contaminant (TAC) emissions to a concentration is considered acceptable to public health professionals. A significant risk is defined as an HI of 1 or greater.

The SCAQMD defines a sensitive receptor as any residence, including private homes, condominiums, apartments, and living quarters, schools, preschools, daycare centers, and health facilities such as hospitals or retirement and nursing homes. For purposes of this HRA, sensitive receptors were placed within the air dispersion model at the location of existing residences and locations along the off-site Project vehicle travel routes. In addition, a uniform nested grid network of receptors was placed over the Project site to complete the receptor network. The nearest sensitive receptor is a residence about 16.54 meters (54 feet) north of the Project site, which was identified as the most impacted sensitive receptor during the construction of the

Project. However, during the operation of the Project, the maximally impacted sensitive receptor was identified to be a residence approximately 22.06 meters (72 feet) north of the Project boundary and east of the nearest sensitive receptor that is identified as the maximally impacted sensitive receptor during construction. The nearest worker receptor is located at a commercial building south of the Project boundary line, approximately 24.12 meters (79 feet) away.

Construction. Table AQ-6 presents a summary of the unmitigated cancer risks and chronic non-cancer hazards resulting from the Project's construction DPM emissions along with the SCAQMD health risk significance thresholds. As noted from Table AQ-6, the estimated maximum cancer risk during construction is 9.15 in one million for maximally impacted sensitive/residential receptors, which is below the significance threshold of 10 in one million. The estimated maximum cancer risk for worker receptors during construction is 0.21 in one million, which is below the 10 in one million significance threshold. The estimated non-cancer hazard index is 0.03 for the maximally impacted sensitive receptor during construction, which is below the significance threshold of 1. Thus, the construction of the Project would have a less-than-significant impact for both cancer risk and chronic non-cancer impacts.

Table AQ-6: Summary of Unmitigated Project Construction Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Analyzed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor Prebirth to 1.39 years	9.15	10	No
Maximum Impacted Sensitive Receptor Adult (1.39 years)	0.51	10	No
Maximum Impacted Worker Receptor (1.39 years)	0.21	10	No
Receptor	Chronic Non-Cancer Hazard Index		Exceeds Significance Threshold?
	Maximum Lifetime Analyzed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor	0.03	1.0	No
Maximum Impacted Worker Receptor	0.01	1.0	No

Source: Appendix B

Operation. Table AQ-7 presents a summary of the unmitigated cancer risks and chronic non-cancer hazards resulting from the Project's operational DPM emissions along with the SCAQMD health risk significance thresholds. As noted from Table AQ-7, the estimated maximum cancer risk during operation is 0.56 in one million for maximally impacted sensitive/residential receptors, which is below the SCAQMD significance threshold of 10 in one million. The estimated maximum cancer risk for worker receptors during operation is 0.03 in one million, which is below the 10 in one million significance threshold. The estimated non-cancer hazard index is 0.01 for the maximally impacted worker receptor during operation, which is below the

significance threshold of 1. Thus, the operation of the Project would have a less-than-significant impact for both cancer risk and chronic non-cancer impacts.

Table AQ-7: Summary of Unmitigated Project Operational Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Analyzed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor Prebirth to 30 years	0.56	10	No
Maximum Impacted Sensitive Receptor Adult (30 years)	0.09	10	No
Maximum Impacted Worker Receptor (25 years)	0.03	10	No
Receptor	Chronic Non-Cancer Hazard Index		Exceeds Significance Threshold?
	Maximum Lifetime Analyzed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor	<0.01	1.0	No
Maximum Impacted Worker Receptor	0.01	1.0	No

Source: Appendix B

Combined Construction and Operation. Table AQ-8 presents the unmitigated combined construction and operational cancer risk for the Project. As shown in Table AQ-8, the unmitigated combined construction and operational cancer risk for the maximally impacted sensitive receptor is 10.07 in one million, which exceeds SCAQMD's 10 in one million cancer risk threshold. The unmitigated combined construction and operational cancer risk for the worker receptor is 0.34 in one million, which is below the significance threshold of 10 in one million. Thus, impacts related to total combined construction and operation cancer risk would be potentially significant.

Table AQ-8: Summary of Unmitigated Combined Project Construction and Operational Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Analyzed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor Prebirth to 30 years	10.07	10	Yes
Maximum Impacted Worker Receptor (25 years)	0.34	10	No

Source: Appendix B

To reduce potentially significant impacts, **Mitigation Measure (MM) AQ-1: Tier 4 Construction Equipment** is proposed. Table AQ-9 presents the mitigated combined construction and operational cancer risk for the Project. As shown in Table AQ-9, with the implementation of MM AQ-1, the combined construction and operational cancer risk for the maximally impacted sensitive receptor would be 9.48 in one million, which is below the significance threshold of 10 in one million. Thus, impacts related to total combined construction and operation cancer risk would be less than significant with the implementation of MM AQ-1.

Table AQ-9: Summary of Mitigated Combined Project Construction and Operational Health Risk

Receptor	Cancer Risk (per million)		Exceeds Significance Threshold?
	Maximum Lifetime Analyzed Project Risk	Significance Threshold	
Maximum Impacted Sensitive Receptor Prebirth to 30 years	9.48	10	No

Source: Appendix B

Based on the results of the LST and HRA analyses, the analyzed Project would result in a less-than-significant impact with mitigation incorporated to nearby receptors. Therefore, potential impacts related to the exposure of substantial pollutant concentrations to sensitive receptors would be less than significant with mitigation incorporated.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:

MM AQ-1: Tier 4 Construction Equipment. During construction, the Project shall use Tier 4 Final or superior equipment for engines exceeding 400 horsepower. If construction equipment cannot meet Tier 4 Final engine certification standards, the Project representative or contractor shall provide a future study with written findings, backed by substantial evidence, for approval by SCAG before resorting to alternative technologies or strategies. Potential alternative strategies may encompass the use of Tier 4 Interim equipment, reducing the number and/or horsepower rating of construction equipment, or limiting simultaneous equipment operation. All equipment shall undergo tuning and adhere to the manufacturer's recommended maintenance schedule and specifications. Maintenance records for each piece of equipment, along with those of their contractors, shall be available for inspection and kept on-site for a minimum of two years following construction completion. An exception to this requirement may be considered if a project can demonstrate that Tier 4 engines are unnecessary to reduce emissions below significance thresholds.

Significance Determination After Mitigation: Less than significant.

d) The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The analyzed Project would not generate any other emissions that were not described previously. The Project site does not contain land uses typically associated with emitting objectionable odors. According to the

SCAQMD CEQA Air Quality Handbook, land uses associated with odor issues include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The analyzed Project would develop and operate as an industrial building, which would not involve the types of uses that lead to odors.

Potential odor sources associated with the analyzed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the analyzed Project's operational uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction; thus, impacts would be less than significant. The analyzed Project would also be required to comply with SCAQMD Rule 402 (included as PPP AQ-3) to prevent occurrences of public nuisance odors.

Therefore, other emissions (such as those leading to odors) that could adversely affect a substantial number of people would not occur from the analyzed Project; impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 403 Fugitive Dust. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.

PPP AQ-2: Rule 1113 Architectural Coatings. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

PPP AQ-3: Rule 402 Nuisance Odors. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

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

The discussion below is based on the General Biological Assessment Report prepared by Blackhawk Environmental in February 2025 (included as Appendix C) as well as the Tree Report prepared by Rico Ramirez in December 2025 (included as Appendix D).

Impact Analysis:

a) The Project would not 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 (CDFW) or United States Fish and Wildlife Service (USFWS).

The Project site is currently developed with three office buildings, paved parking lots, landscaping, and ornamental trees. The Project site is located within an urban area and is surrounded by residential, commercial, and industrial development. No endangered, rare, threatened, or special status plant species (or

associated habitats) or wildlife species designated by the USFWS, CDFW, or California Native Plant Society (CNPS) occur on the site due to lack of suitable habitat.

The analyzed Project would redevelop the site with an industrial building, which would include installation of new ornamental landscaping and trees. As no sensitive species or habitat currently exists within the urban and developed site, implementation of the Project would not result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive species, and no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not 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 CDFW or USFWS.

Riparian habitats occur along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. As previously described, the Project site is fully developed and located within an urban area. No riparian habitat or other sensitive natural communities occur on or adjacent to the Project site (Appendix C). Additionally, the Project site and adjacent areas are not included in any local or regional plans, policies, or regulations that identify riparian habitat or other sensitive natural community. Therefore, no impacts related to riparian habitat or other sensitive natural communities would occur as a result of Project implementation.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

c) The Project would not 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.

Wetlands are defined under the Federal Clean Water Act as land that is flooded or saturated by surface water or groundwater sufficient to support vegetation adapted to saturated soils. Wetlands include areas such as swamps, marshes, and bogs. As previously described, the Project site is fully developed and located within an urban area. No wetlands occur on or adjacent to the Project site (Appendix C). Therefore, the redevelopment of the Project site would result in no impacts to wetlands.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

d) The Project would not 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.

Wildlife corridors are areas where wildlife movement is concentrated due to natural or anthropogenic constraints and corridors provide access to resources such as food, water, and shelter. Animals use these corridors to move between different habitats and provide avenues for wildlife dispersal, migration, and contact between other populations. The Project site does not support conditions for migratory wildlife corridors or linkages. The Project site is located within an urban area and is fully developed with three office buildings and paved parking lots. The Project site is surrounded by residential, commercial, and industrial development. There are no rivers, creeks, or open drainages near the site that could function as a wildlife corridor. Therefore, implementation of the Project would not result in impacts related to wildlife movement or wildlife corridors.

Ornamental trees are present along the Project site's frontage on Glassell Street and Fletcher Avenue, within the City's right-of-way (ROW), and within the interior of the site. Many of these trees would be removed during construction. Therefore, the analyzed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season that occurs from February 1 through September 15. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA could result in a potentially significant impact if requirements of the MBTA are not followed. Therefore, MM BIO-1 has been included to reduce impacts to nesting birds covered under the MBTA. MM BIO-1 requires a nesting bird survey to be conducted prior to initiating any vegetation clearing, if vegetation is required to be removed during nesting bird season. With the implementation of MM BIO-1, Project impacts related to nesting birds would be less than significant.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:

MM BIO-1: Conduct Pre-construction Nesting Bird Survey. If vegetation removal or initial grading occurs during the breeding season, nesting bird surveys shall be conducted by a qualified biologist for nesting raptors and migratory birds, and within an additional 100-foot survey buffer (for passerines) and 300-foot buffer for raptors within 3 days of construction. If nests of listed birds, migratory birds, raptors, or other sensitive species are documented, active nests shall be avoided, and a nest buffer shall be designated around each nest. Nest buffers shall be determined at the discretion of the qualified biologist based on the location and species occupying the nest. Species that are not covered by the MBTA (such as European starling, house sparrow, Eurasian collared dove, etc.) shall not require a nest buffer. The perimeter of this nest buffer shall be clearly demarcated, and all construction activities shall be prohibited within the delineated area until a qualified biologist has determined that the nest has either successfully fledged, been depredated, or failed due to other causes. Construction activities may proceed within the non-disturbance buffer if a qualified biologist is present to monitor active nests and determines that construction activities are not causing indirect or direct disturbance to a nest.

Significance Determination After Mitigation: Less than significant.

e) The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The Project site contains ornamental trees along Glassell Street and Fletcher Avenue, within the City's ROW. Ornamental trees are also present within the interior of the site. A Tree Report was prepared to evaluate the trees on-site and is included as Appendix D. A field survey occurred, and observations were documented pertaining to disease, structural defects, and other notable instances. During the survey, 268 trees were identified within the Project site and 14 trees were identified within the City's ROW, for a total of 282 trees. No native or heritage trees were observed during the survey. The tree species identified within the site were Aleppo pine (*Pinus halepensis*), Chinese elm (*Ulmus parvifolia*), Canary Island date palm (*Phoenix canarensis*), and Peruvian pepper tree (*Schinus molle*). The trees along the site and within the City's ROW are Aleppo Pine trees (*Pinus halepensis*).

The City participates in the Orange County Natural Community Conservation Planning (NCCP) program and the Master Street Tree Plan, which are the primary local measures to protect biological resources. The City of Orange Municipal Code Chapter 12.32, *Tree Preservation*, prohibits the removal of trees, including historic trees, from undeveloped and public interest property without a permit. In addition, the removal of the recognized City of Orange Street Trees must be approved by the Director of Public Works and must comply with the provisions within the Master Street Tree Plan. These requirements include replacement or relocation of trees as necessitated.

The Project includes removal of 231 trees from within the site plus 1 City of Orange tree from within the City's ROW along Fletcher Avenue, for a total of 232 trees (Appendix D). No native or heritage trees would be removed as a result of analyzed Project. The trees that would be removed would be replanted in accordance with the City of Orange Municipal code. In addition, only one City of Orange tree is proposed to be removed within the ROW along Fletcher Avenue and would require a tree removal permit from the City (Appendix D). The Project would provide a total of 166 trees, including existing trees to remain, as shown in Figure 10, *Landscape Plan*. To reduce impacts and promote good tree health for the existing trees during Project construction, MM BIO-2 is proposed. With the implementation of MM BIO-2, potential impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance would be less than significant.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:

MM BIO-2: Tree Protected Zone. The Project shall establish a Tree Protected Zone (TPZ) to preserve existing trees during construction. The TPZ encompasses the area within the dripline of the tree and extends at least five feet beyond the dripline, or 15 feet from the trunk of the tree, whichever is greater. The TPZs shall be identified when construction plans are finalized and shall be shown on the final plan set. Underground services such as utility lines, irrigation, or piping shall be placed outside the TPZ. Screening wall construction would not be subject to the TPZ.

Temporary orange safety fencing shall be installed prior to ground-disturbing operations to clearly delineate the TPZ. The fence shall stay in place throughout grading and construction. If pruning is required to provide adequate construction clearance, all pruning shall be completed by a Certified Arborist or Tree Worker, not by construction personnel.

All contractors shall conduct operations in a manner that will prevent damage to protected trees. No work, grading, excavation, construction, storage, parking, or dumping shall occur within the fenced TPZ. Construction of underground services shall not cause impacts in the TPZ. The fencing may not be relocated or removed without permission of a qualified arborist or biologist and shall remain in-place until all site work has been completed. If any protected trees are injured during construction, it shall be evaluated as soon as

possible by the qualified arborist or biologist so that appropriate treatments can be applied. Any decayed or diseased trees identified during construction shall be removed to prevent the spread of disease, pathogens or pests and for fire safety.

Significance Determination After Mitigation: Less than significant.

f) The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

The City is a participant in the Orange County NCCP, which was approved in 1996. As shown in Figure 5.4-2, *NCCP Habitat Reserve Area*, of the City of Orange General Plan Program EIR, the Project site is not identified as a reserve, non-reserve open space, or special linkage. As such, development of the Project would not conflict with any of the provisions set forth in the Orange County NCCP. The Project site does not fall within any other local or regional conservation plans. Therefore, development of the Project would not conflict with such plans and no potential impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

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

The discussion below is based on the Cultural Resources Study prepared by BFS Environmental Services in February 2025 (included as Appendix E).

Impact Analysis:

a) The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.

According to State CEQA Guidelines, Section 15064.5, a historical resource shall include a resource listed in, or determined eligible for listing in, the California Register of Historical Resources. In addition, the following resources shall be presumed to be historically or culturally significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant:

1. A resource listed in, or determined eligible for listing in, the California Register of Historical Resources;
2. A resource listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);
3. A resource identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or
4. Finally, any resource determined to be a historical resource by the project's Lead Agency may be considered to be an historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record.

A record search from the South Central Coastal Information Center (SCCIC) at California State University, Fullerton was requested by Brian F. Smith and Associates, Inc., for historical resources located on or within one mile of the Project site. The search disclosed that although no previously recorded resources were identified within the Project site, nine historic resources are recorded within one mile of the Project. The previously recorded resources consist of the Rancho Santiago de Santa Ana headquarters, two trash scatters, the Olive Heights neighborhood comprised of 48 individual properties, the Olive Civic Center, a California Historic Landmark (CHL) plaque for the location of Old Santa Ana, one single-family residence, one garage, and the Fletcher Retarding Basin and Channel (Appendix E). No historic resources were identified within the records search as located within the Project site. The Project site contains three office buildings constructed between 1985 and 1988 and therefore does not meet the minimum age threshold to be considered historic in accordance with CEQA. Further, structures adjacent to the Project site are industrial, office, and commercial buildings as well as single family residences which do not hold any artistic value or represent a

special element of the City of Orange and are not considered historic resources. Therefore, potential impacts of Project development related to historic resources would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

As mentioned previously, the Project site is currently developed. As part of the Cultural Resources Study prepared for the Project (Appendix E), research was conducted on all relevant data within a one-mile radius of the Project site, including a review of SCCIC records, the National Register of Historic Places, historic USGS maps, the Office of Historic Preservation's Built Environment Resource Directory, and historic aerial photographs. The records search indicated that 21 previous studies have been conducted within a mile of the Project site and that no archaeological or prehistoric resources have ever been recorded within the vicinity of the project (Appendix E). Further, a Sacred Lands File was requested from the Native American Heritage Commission and the results were negative for any recorded Native American sacred sites or locations of religious or ceremonial importance within the project vicinity (Appendix E). In addition, a field survey was conducted on February 7, 2025, in which no cultural resources were identified within the Project site (Appendix E). Based upon the results of the cultural resources study and field survey as well as the current disturbed and developed state of the Project site, it was determined that there is little to no potential for the inadvertent discovery of significant archaeological deposits. However, in the event that any historic or prehistoric cultural resources are inadvertently discovered, all construction work in the immediate vicinity of the discovery shall stop and a qualified archaeologist shall be engaged to evaluate the discovery as described in MM CUL-1. With the implementation of MM CUL-1, impacts related to archaeological resources would be less than significant.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:

MM CUL-1: Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g).

If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC).

Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.

Significance Determination After Mitigation: Less than significant.

c) The Project would not disturb any human remains, including those interred outside of dedicated cemeteries.

The Project site is currently fully developed with office uses and has not previously been used as a cemetery. Thus, human remains are not anticipated to be uncovered during Project construction. In the event of an accidental discovery of any human remains, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative. Pursuant to Section 5097.98 of the California Public Resources Code, as included as PPP CUL-1, if the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law would ensure that no impacts to human remains would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. In the event that human remains are encountered on the Project site, work within 50 ft of the discovery shall cease and the County Coroner shall be notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. Prior to the issuance of grading permits, the City Community and Planning, Building, and Code Enforcement Department Director, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

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

The discussion below is based on the Air Quality, Energy, and Greenhouse Gas Impact Analysis prepared by EPD Solutions, Inc. in April 2026 (included as Appendix A).

Impact Analysis:

a) The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Construction

Construction of the analyzed Project would occur over a 17-month duration. During construction, energy would be consumed in the three general forms listed below. No natural gas use is anticipated during construction.

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the site, as well as haul and delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass

Transportation energy represents the largest energy use during construction and would result from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum-based fuels (e.g., diesel fuel and/or gasoline). Therefore, the analysis of energy use during construction focuses on fuel consumption. Construction trucks and vendor trucks travel would be anticipated to use diesel fuel, whereas construction worker vehicles would be anticipated to use gasoline-powered vehicles. Fuel consumption from transportation uses depends on the type and number of trips, vehicle miles traveled (VMT), the fuel efficiency of the vehicles, and the travel mode.

Construction activities related to the proposed manufacturing and warehousing development, and the associated infrastructure is not expected to result in demand for fuel greater on a per-development basis than other development projects in Southern California. Estimates of diesel and gasoline fuel usage were based on construction equipment assumptions and trip estimates from CalEEMod version 2022.1 and fuel efficiencies from EMFAC2021. Table E-1 details the construction fuel usage over the Project's construction period.

Table E-1: Construction Equipment Fuel Usage (Off-Road)

Activity	Equipment	Number	Hours per Day	Horse-power	Load Factor	Days of Construction	Total Horsepower-hours	Fuel Rate (gal/hp-hr)	Fuel Use (gallons)
Demolition	Rubber Tired Dozers	2	10	367	0.4	75	220,200	0.047455	10,450
	Excavators	3	10	36	0.38	75	30,780	0.051215	1,576
	Concrete/Industrial Saws	1	10	33	0.73	75	18,068	0.041899	757
	Crushing/Proc. Equipment	1	10	200	0.6	75	90,000	0.050642	4,558
Site Preparation	Rubber Tired Dozers	3	10	367	0.4	10	44,040	0.047455	2,090
	Crawler Tractors	4	10	87	0.43	10	14,964	0.050488	756
Grading	Graders	1	10	148	0.41	30	18,204	0.051539	938
	Excavators	2	10	36	0.38	30	8,208	0.051215	420
	Scrapers	2	10	423	0.48	30	121,824	0.048091	5,859
	Rubber Tired Dozers	1	10	367	0.4	30	44,040	0.047455	2,090
	Crawler Tractors	2	10	87	0.43	30	22,446	0.050488	1,133
Building Construction	Forklifts	3	10	82	0.2	300	147,600	0.053254	7,860
	Generator Sets	1	10	14	0.74	300	31,080	0.069091	2,147
	Cranes	1	10	367	0.29	300	319,290	0.053012	16,926
	Welders	1	10	46	0.45	300	62,100	0.030238	1,878
	Tractors/Loaders/Backhoes	3	10	84	0.37	300	279,720	0.053121	14,859
Paving	Pavers	2	10	81	0.42	20	13,608	0.051517	701
	Paving Equipment	2	10	89	0.36	20	12,816	0.051165	656
	Rollers	2	10	36	0.38	20	5,472	0.052592	288
Architectural Coating	Air Compressors	1	10	37	0.48	40	7,104	0.02939644	209
Total									76,151

Source: Appendix A

Table E-2 shows that construction workers would use approximately 52,453 gallons of gasoline fuel to travel to and from the Project site. Haul trucks would use 3,051 gallons of diesel and vendor trucks would use 33,403 gallons of diesel fuel traveling to and from the Project site. This is in addition to the construction equipment fuel listed in Table E-1.

Table E-2: Estimated Construction Vehicle Fuel Usage

Construction Source	Total Number of Trips	VMT	Fuel Rate	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Haul Trucks	463	18,500	6.06	3,051	0
Vendor Trucks	14,700	299,880	8.98	33,403	0
Worker Vehicles	41,230	1,525,510	29.08	0	52,453
Total				36,453	52,453

Note: Numbers have been rounded.
Source: Appendix A

Table E-3 shows the overall fuel consumption for construction of the analyzed Project. As shown in Table E-3, construction of the Project would consume approximately 52,453 gallons of gasoline fuel and 112,604 gallons of diesel fuel.

Table E-3: Total Project Construction Fuel Usage

Construction Sources	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	36,453	52,453
Off-Road Construction Equipment	76,151	0
Total	112,604	52,453

Source: Appendix A

According to fuel consumption information obtained from EMFAC2021, approximately 9,467,772 gallons of gasoline and 1,295,850 gallons of diesel fuel would be consumed in Orange County in 2025 through 2027. Thus, the construction of the Project would marginally increase the annual fuel usage during the 17 months of construction spanning three calendar years within Orange County by 0.55 percent for annual gasoline consumption and 7.99 percent for annual diesel consumption. As such, Project construction would have a negligible effect on local and regional energy supplies.

Construction of the Project would result in fuel consumption from the use of construction tools and equipment, vendor and haul truck trips, and vehicle trips generated from construction workers traveling to and from the site. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than that utilized at comparable construction sites in the region or the state. Construction contractors are required to demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption. Overall, construction activities would require limited energy consumption as construction of the Project would only last 17 months, and would comply with all existing regulations, and would therefore not be anticipated to use large amounts of energy

or fuel. Therefore, the analyzed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction and impacts would be less than significant.

Operation

Once operational, the Project would generate demand for electricity, natural gas, gasoline, and diesel. Operational use of energy includes the heating, cooling, and lighting of the building, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. It should be noted that although the Project does not propose the usage of natural gas during operations, this analysis presents a conservative account of the Project's natural gas consumption during operations to provide future flexibility.

Electricity and natural gas consumption was estimated for the Project using default energy intensities by land use type in CalEEMod version 2022.1. The amount of operational fuel use was estimated using CARB's EMFAC2021 model. Table E-4 presents the Project's estimated operational energy use. As detailed in Table E-4, operation of the analyzed Project is estimated to result in the net increase of approximately 3,499,284 thousands British Thermal Units of natural gas use and approximately 244,663 gallons of diesel fuel use but a net decrease of approximately 1,572,428 kilowatt-hours of electricity use and approximately 111,783 gallons of gasoline use. The analyzed Project is expected to require more natural gas and diesel fuel than the existing use on-site but would consume less electricity and gasoline fuel than the existing use. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

Table E-4: Estimated Project Operational Energy Usage

Operational Source	Annual Energy Usage	
Electricity Consumption (Kilowatt-hours)		
Analyzed Project	2,065,323	
Existing Use	3,637,751	
Natural Gas Consumption (Thousands British Thermal Units)		
Analyzed Project ¹	8,343,678	
Existing Use	4,844,394	
Petroleum (Gasoline) Consumption		
	Annual VMT	Gallons of Gasoline Fuel
Analyzed Project	2,511,385	86,351
Existing Use	5,762,416	198,133
Petroleum (Diesel) Consumption		
	Annual VMT	Gallons of Diesel Fuel
Analyzed Project	1,835,754	246,051
Existing Use	0	1,388
Net Total Energy Consumption		
Net Electricity Consumption (Kilowatt-Hours)		-1,572,428
Net Natural Gas Consumption (Thousands British thermal Units)		3,499,284
Net Gasoline Consumption (Gallons)		-111,783
Net Diesel Consumption (Gallons)		244,663

Notes: Numbers have been rounded.

¹The Project does not propose the usage of natural gas during operations. However, this analysis presents a conservative account of the Project's natural gas consumption during operations to provide future flexibility.
Source: Appendix A

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. Also, as Title 24 has become more progressive in realizing energy reductions and increasing efficiency, it now has requirements for solar installation for non-residential projects. Title 24 now mandates incorporation of solar photovoltaic systems and battery storage in many non-residential projects, or for non-qualifying projects installation of solar-ready roofs and systems. These requirements serve to offset electricity demand. The analyzed Project would be required to adhere to applicable Title 24 requirements in effect at the time of permitting of the Project. The Project's compliance with Title 24 will be confirmed prior to issuance of building permits. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Furthermore, the Project would be designed to LEED Gold standards, which certify high levels of environmental performance in areas such as energy efficiency, water conservation, and sustainable building materials. LEED Gold certification reflects a commitment to sustainability beyond minimum code requirements. Thus, the operation of the Project would not use large amounts of energy or fuel. Therefore, the analyzed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during operations and impacts would be less than significant.

Overall, construction and operational fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other similar uses in the region, and impacts would be less than significant.

Significance Determination: Less than significant impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant impact.

b) The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

The Title 24 California Energy Code is designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. These measures are listed in Part 6 of the California Code of Regulations. The California Energy Commission is responsible for adopting, implementing, and updating building energy efficiency codes. Local city and county enforcement agencies have the authority to verify compliance with applicable building codes, including energy efficiency. As previously described, the Project would be required to comply with the Title 24 requirements in effect during permitting of the Project. The City's Planning Department would review the design components and energy conservation measures during the permitting process, which would ensure that all requirements are met. Furthermore, the Project would be designed to LEED Gold standards, which reflects a commitment to sustainability beyond minimum

code requirements. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant impact.

Significance Determination: Less than significant impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant impact.

7. GEOLOGY AND SOILS.		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>					
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
	ii) Strong seismic ground shaking?	☐	☐	☒	☐
	iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv) Landslides?	☐	☐	☐	☒
(b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The discussion below is based on the Geotechnical Exploration Report prepared by Leighton Consulting, Inc., in January 2022 (included as Appendix F) and the Paleontological Resources Assessment prepared by BFS&A Environmental Services in February 2025 (included as Appendix G).

Impact Analysis:

a) i) The Project would not 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.

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. No known active faults are mapped across the site (Appendix F). The nearest active fault to the Project site is the Elsinore, which is located approximately 6.3 miles from the site (Appendix F). Thus, the Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map, and impacts would not occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

a) ii) The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The Project site is located within a seismically active region of Southern California. The nearest active fault to the Project site is the Elsinore, which is located approximately 6.3 miles from the site (Appendix F). Thus, moderate to strong ground shaking can be expected at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology.

Structures built in the City are required to be built in compliance with the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2), included in the Municipal Code as Chapter 15.04. Compliance with the CBC, included as PPP GEO-1, provides provisions for earthquake safety based on factors including occupancy type, the types of soils on-site, and the probable strength of the ground motion. Mandatory compliance with the CBC would include the incorporation of; 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Implementation of CBC standards would be verified by the City during the plan check and permitting process. Because the analyzed Project would be constructed in compliance with the CBC, the Project would result in a less than significant impact related to strong seismic ground shaking.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

a) iii) The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface.

The Project site is not located within an area identified by the State of California as being potentially susceptible to liquefaction (Appendix F). The Project site contains fill soils, which consist of locally derived clayey sand, clayey silt, silty clay, and clay with variable amounts of gravel. Additionally, groundwater was not encountered in the soil borings which reached a maximum depth of 41 feet below ground surface. The

most recent water level readings from a monitoring well located approximately 0.9 miles northwest of the site indicated a groundwater level of 96.6 feet below the ground surface. As discussed in the Geotechnical Exploration Report, removal of existing undocumented fill is anticipated to reach depths of approximately 3 to 7 feet below existing grade across most of the site (Appendix F). Therefore, groundwater is not anticipated to be reached during grading (Appendix F).

Furthermore, structures built in the City are required to be built in compliance with the CBC, as included in the City's Municipal Code as Chapter 15.04 (and herein as PPP GEO-1), which implements specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. Compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that structures would withstand the effects of seismic ground movement, including liquefaction and settlement. Compliance with the requirements of the CBC and City's Municipal Code for structural safety, included as PPP GEO-1, would ensure that hazards from seismic-related ground failure would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

a) iv) The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

Landslides and other slope failures are secondary seismic effects of earthquakes. Areas that are most susceptible to earthquake-induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

As described above, the Project site is located in a seismically active region subject to strong ground shaking. However, the site is relatively flat and does not contain any hills or any other areas that could be subject to landslides. The Project site is not located within a landslide hazard zone as identified by the State of California (Appendix F). Therefore, the Project would not cause potential substantial adverse effects related to slope instability or seismically induced landslides and no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not result in substantial soil erosion or the loss of topsoil.

Construction of the Project has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water.

The Project would be required to comply with the City's Municipal Code Chapter 7.01, *Water Quality and Stormwater Discharges*, which establishes water quality and stormwater discharge standards. These include installation of best management practices (BMPs) in compliance with the Orange County MS4 Permit to

minimize soil erosion. Additionally, the Construction General Permit (Order No. 2022-0057-DWQ) issued by the State Water Resources Control Board (SWRCB) regulates construction activities to minimize water pollution, including sediment. The Project would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated BMPs during grading and construction. With compliance with Regional Water Quality Control Board (RWQCB) SWPPP requirements, and installation of BMPs, which would be ensured by the City's project review by the Department of Building and Safety, construction impacts related to erosion and loss of topsoil would be less than significant.

The analyzed Project includes installation of landscaping throughout the site and the parking areas. With this landscaping, areas of loose topsoil that could be eroded by wind or water would not exist upon operation of the analyzed Project. In addition, as described in Section 10, *Hydrology and Water Quality*, the hydraulic features of the analyzed Project have been designed to slow, filter, and retain stormwater within landscaping and the proposed underground infiltration system, which would also reduce the potential for stormwater to erode topsoil. Furthermore, implementation of the Project requires City approval of a Water Quality Management Plan (WQMP), which would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) The Project would not 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.

The Project site is relatively flat and neither contains nor is adjacent to any slope or hillside area. As previously stated, the Project site is not within a landslide hazard area (Appendix F). The Project would not create slopes. Thus, neither on- or off-site landslides would occur from implementation of the Project.

Lateral spreading is a type of liquefaction induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. Since the Project site is not susceptible to liquefaction and the site is relatively flat and constrained laterally, earthquake-induced lateral spreading is not considered a hazard at the site (Appendix F). As described previously, compliance with the CBC, included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including lateral spreading. Thus, impacts related to lateral spreading would be less than significant.

Differential settlement or subsidence could occur if buildings or other improvements were built on low-strength foundation materials or if improvements were constructed on different types of subsurface materials. Seismically-induced settlement consists of dynamic settlement of unsaturated soil (above

groundwater) and liquefaction-induced settlement (below groundwater). Soils susceptible to settlement typically include low density sandy soils. According to the Geotechnical Exploration Report, the total seismically-induced settlement is estimated to be less than ½ inch (Appendix F). The differential settlement is estimated as half the total settlement over a horizontal distance of 30 feet. However, in compliance with the CBC and recommendations of the Geotechnical Exploration Report, excavation and re-compaction of the artificial fill soils would ensure that settlement related impacts would be less than significant.

Thus, with compliance with the CBC, included as PPP GEO-1, and compliance with the recommendations of the Geotechnical Exploration Report, potential impacts related to settlement or subsidence would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

d) The Project would not be located on expansive soil and create substantial direct or indirect risks to life or property.

Expansive soils contain certain types of clay minerals that shrink or swell as moisture content changes. Shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experiences, such as Southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Geotechnical Exploration Report (included as Appendix F) performed expansion index testing on two near-surface bulk soil samples to evaluate the potential for expansive soils at the site. The results of expansion index testing indicated that near surface soils have a “Low” potential for expansion (Appendix F). Compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations for the grading plans and building specifications as a condition of construction permit approval to ensure that structures would withstand the effects of related to ground movement, including expansive soils. Engineering design recommendations would be reviewed and approved by the City’s Building Official or designee prior to issuance of building permits. Thus, impacts related to expansive soils would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

e) The Project would not 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.

The Project would connect to existing public wastewater infrastructure and would not require the use of septic tanks or alternative methods of wastewater disposal. Therefore, the Project would not result in any impacts related to this topic.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

f) The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The Paleontological Resources Assessment describes that most of the Project site is underlain with late to middle Pleistocene-aged old alluvial fan deposits, which have a high paleontological sensitivity (Appendix G). The Paleontological Resources Assessment prepared for the Project included a locality and records search performed by the Natural History Museum of Los Angeles County (LACM). The records search indicates that no fossil localities were identified within the Project site. The closest known fossil localities consisting of wild sheep remains in Pleistocene deposits are located just over one mile northwest of the Project site, south of Lincoln Avenue along Rio Vista Avenue (Appendix G). Proboscidean bones in Pleistocene terrace deposits are located between two and three miles to the northeast of the Project site. A third locality, with Pleistocene rodent remains, is located several miles away at the former El Toro marine base (Appendix G).

The Project consists of demolition of existing on-site structures and construction of an industrial building and associated improvements. As discussed in the Geotechnical Exploration Report, removal of existing undocumented fill is anticipated to reach depths of approximately 3 to 7 feet below existing grade across most of the site (Appendix F). Earthmoving activities, including grading and excavation activities, would have the potential to disturb previously unknown paleontological resources if earthmoving activities occur at substantial, undisturbed depths. Therefore, **MM GEO-1** has been proposed, which requires the retention of a paleontologist as described therein, and the preparation of a Paleontological Resources Impact Mitigation Program (PRIMP), which would establish monitoring procedures and discovery protocols, based on industry standards. With the implementation of MM GEO-1 into the Project, impacts to paleontological resources from development of the Project would be less than significant.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:

MM GEO-1: Paleontological Resources. Prior to the issuance of the grading permit, the Applicant shall provide a letter to the City of Orange Planning Division, or designee, from a paleontologist selected from the roll of qualified paleontologists maintained by the City, stating that the paleontologist has been retained to provide services for the Project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite for the review and approval by the City. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource surveillance. The PRIMP shall also require paleontological monitoring for ground disturbing activities greater than five feet in depth within native soil, as determined by the Project paleontologist.

In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.

Criteria for discard of specific fossil specimens will be made explicit. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material

prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource. A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils, shall be prepared by the paleontologist and submitted to the appropriate City personnel.

Significance Determination After Mitigation: Less than significant.

Existing Plans, Programs, or Policies

PPP GEO-1: Compliance with California Building Code. Prior to issuance of any construction permits, the Project is required to demonstrate compliance with the California Building Code as included in the City's Municipal Code Chapter 15.04 to preclude significant adverse effects associated with seismic hazards. California Building Code related and geologist and/or civil engineer specifications for the project are required to be incorporated into grading plans and specifications as a condition of construction permit approval.

8. GREENHOUSE GAS EMISSIONS.		<div>Less than Significant</div> <div>Potentially Significant Impact With Mitigation Incorporated Less Than Significant Impact No Impact</div>			
<i>Would the project:</i>					
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The discussion below is based on the Air Quality, Energy, and Greenhouse Gas Impact Analysis, prepared by EPD Solutions, Inc. in June 2025 (included as Appendix A).

Greenhouse Gas Thresholds

The SCAQMD does not have approved thresholds; however, the SCAQMD does have draft thresholds that provide a tiered approach to evaluate greenhouse (GHG) impacts. The current interim SCAQMD thresholds include the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - All land use types: 3,000 MTCO₂e
 - Based on land use type: residential: 3,500 MTCO₂e per year; commercial: 1,400 MTCO₂e; or mixed use: 3,000 MTCO₂e per year
- Tier 4 has the following options:
 - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
 - Option 3, 2020 Target: For service populations (SP), including residents and employees, 4.8 MTCO₂e /SP/year for projects and 6.6 MTCO₂e /SP/year for plans.
 - Option 3, 2035 Target: 3.0 MTCO₂e /SP/year for projects and 4.1 MTCO₂e /SP/year for plans.
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The assessment of the analyzed Project applies the SCAQMD's Tier 3 screening threshold of 3,000 MTCO₂e. In addition, SCAQMD methodology for project construction is to average construction emissions over 30 years and then add them to the project's operational emissions to determine if the project would exceed the screening values listed above (Appendix A).

Impact Analysis:

a) The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Global climate change is not confined to a particular project area. A typical project does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

Construction

Construction activities produce combustion emissions from various sources, such as site excavation, grading, utility engines, heavy-duty construction vehicles on-site, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

In addition, operation of the proposed industrial building would result in area and indirect sources of operational GHG emissions that would primarily result from vehicle trips, electricity and natural gas consumption, water transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the building would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source.

GHG emissions during Project construction and operations were estimated using CalEEMod version 2022.1. In accordance with SCAQMD recommendations, the Project's amortized construction related GHG emissions (as shown in Table GHG-1) are added to the operational emissions in order to determine the Project's total annual estimated GHG emissions. The estimated operational GHG emissions that would be generated from implementation of the analyzed Project, combined with the construction emissions, are shown in Table GHG-2. As shown in Table GHG-2, net GHG emissions would be less than the SCAQMD's Tier 3 threshold of 3,000 MTCO₂e. Therefore, based upon SCAQMD's screening threshold, impacts related to GHG emissions would be less than significant.

Table GHG-1: Project Construction GHG Emissions

Activity	Annual GHG Emissions (MTCO₂e)
2025	513
2026	821
2027	4
Total Emissions	1,337
Total Emissions Amortized Over 30 Years	45

Notes: Numbers have been rounded. MTCO₂e = metric tons of carbon dioxide equivalent.

Source: Appendix A

Table GHG-2: Project Total GHG Emissions

Activity	Annual GHG Emissions (MTCO₂e)
Project Operation	
Mobile	3,200
Area	6
Energy	769
Water	169
Waste	98
Refrigerant	5
Off-Road	864
Stationary	5
Total Project Gross Operation Emissions	5,115
Project Construction	
Amortized Construction Emissions	45
Project Construction and Operation	
Project Total Emissions	5,160
Existing Emissions	2,913
Net New Emissions	2,247
SCAQMD Significance Threshold	3,000
Threshold Exceeded?	No

Notes: Numbers have been rounded. MTCO₂e = metric tons of carbon dioxide equivalent; SCAQMD = South Coast Air Quality Management District

Source: Appendix A

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The Project includes the development of an industrial building with manufacturing, warehouse, and office space. The design of the proposed building would comply with State and federal programs that are designed to ensure energy efficiency and reduce GHG emissions.

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan set the State's GHG emissions reduction target for 2045 at 85 percent below 1990 levels, which was codified by Senate Bill 32. Table GHG-3 shows the Project's consistency with the 2022 Scoping Plan. As shown in Table GHG-3, the Project is consistent with the 2022 Scoping Plan.

Table GHG-3: Project Consistency with 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40 percent below 1990 levels by 2030.	Consistent. The Project would comply with the 2025 Title 24 Part 6 and Part 11 building energy and energy efficiency requirements along with other local and State initiatives that aim to achieve the 40 percent below 1990 levels by 2030 goal. Additionally, the Project would be designed to LEED gold standards and would further increase energy efficiency and reduce GHG emissions.
Smart Growth/Vehicle Miles Traveled (VMT)	
VMT per capita reduced 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.	Consistent. The analyzed Project would provide up to twenty (20) bicycle parking spaces to encourage alternative modes of transportation. The Project would also reduce passenger vehicle trips compared to the site's existing use. The Project is consistent with the growth and land use assumptions in the Southern California Association of Government's 2022 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (which was utilized for growth estimates in CARB's 2022 Scoping Plan) including reductions in VMT per capita. The plan aims to reduce VMT per capita by 25 percent below 2019 levels by 2030 and 30 percent by 2045, which aligns with targets set in the CARB Scoping Plan. Thus, the Project would not interfere with VMT reduction targets and measures.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100 percent of LDV sales are ZEV by 2035.	Consistent. The analyzed Project is a speculative industrial building that could potentially involve the manufacturing and storage of LDV ZEVs. The future tenant would be required to comply with the CARB's Advanced Clean Truck Regulation and would be designed and constructed in accordance with the 2025 Title 24 Part 6 and Part 11 requirements, which includes constructing infrastructure to allow for electric vehicle charging.
Truck ZEVs	
100 percent of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Consistent. The analyzed Project is a speculative industrial building that could potentially involve the manufacturing and storage of MDV/HDC ZEVs. The future tenant would be required to comply with the CARB's Advanced Clean Truck Regulation that would require truck manufacturers to transition from

Action	Consistency
	diesel trucks to zero emission trucks and would be designed and constructed in accordance with the 2025 Title 24 Part 6 and Part 11 requirements, which include constructing infrastructure to allow for electric vehicle charging.
Aviation	
20 percent of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. The analyzed Project would not utilize aviation fuel.
Ocean-Going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25 percent of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The analyzed Project would not utilize any OGVs.
Port Operations	
100 percent of cargo handling equipment is zero-emission by 2037. 100 percent of drayage trucks are zero emission by 2035.	Not Applicable. The analyzed Project would not impact operations of the closest major port (Port of Long Beach).
Freight and Passenger Rail	
100 percent of passenger and other locomotive sales are ZEV by 2030. 100 percent of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The analyzed Project would not involve any freight or passenger rail operations.
Oil and Gas Extraction	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Not Applicable. The analyzed Project would not involve oil and gas extraction operations.
Petroleum Refining	
CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	Not Applicable. The analyzed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO _{2e}) in 2030 and 30 MMTCO _{2e} in 2035.	Consistent. The analyzed Project would be consistent with Title 24, Part 6, including increases in on-site renewable energy generation requirements via the implementation of solar as well

Action	Consistency
Retail sales load coverage 13420 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	as improved insulation reducing energy consumption. Additionally, the Project would be designed to LEED gold standards, which would increase energy efficiency.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would be consistent and comply with Title 24 Section 6 requirements for commercial buildings, including complying with 100 percent electric appliances beginning in 2029.
Existing Residential Buildings	
80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The analyzed Project would not involve the sale of appliances, does not propose residential buildings and does not involve any existing residential buildings.
Existing Commercial Buildings	
80 percent of appliance sales are electric by 2030, and 100 percent of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The analyzed Project does not involve the sale of appliances and would not interfere with the action of the replacement of non-electric heat pumps for existing commercial buildings by 2030.
Food Products	
7.5 percent of energy demand electrified directly and/or indirectly by 2030; 75 percent by 2045.	Not Applicable. The analyzed Project includes a speculative industrial building that would be used for warehousing and manufacturing uses and does not propose cold storage.
Construction Equipment	
25 percent of energy demand electrified by 2030 and 75 percent electrified by 2045.	Consistent. The analyzed Project would be required to use construction equipment that is registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25 percent in 2030 and 75 percent in 2045.

Action	Consistency
Chemicals and Allied Products; Pulp and Paper	
<p>Electrify 0 percent of boilers by 2030 and 100 percent of boilers by 2045.</p> <p>Hydrogen for 25 percent of process heat by 2035 and 100 percent by 2045.</p> <p>Electrify 100 percent of other energy demand by 2045.</p>	<p>Consistent. As the Project proposes a speculative industrial building, there is a potential for the Project to involve the production and/or storage of chemicals and allied products like pulp and paper. The Project would comply with the energy demands of the 2025 Title 24 Section 6 Building Codes and would comply with the electricity and hydrogen requirement by 2045 for the production of chemicals and allied products.</p>
Stone, Clay, Glass, and Cement	
<p>Carbon capture and storage (CCS) on 40 percent of operations by 2035 and on all facilities by 2045.</p> <p>Process emissions reduced through alternative materials and CCS.</p>	<p>Consistent. As the Project proposes a speculative industrial building, there is a potential for the Project to involve the production and/or storage of stone, clay, glass and/or cement. The Project would comply with the energy demands of the 2025 Title 24 Section 6 Building Codes and would promote the implementation and use of CCS for operations by 2035 and on all operations and facilities by 2045.</p>
Other Industrial Manufacturing	
<p>0 percent energy demand electrified by 2030 and 50 percent by 2045.</p>	<p>Consistent. As the Project proposes a speculative industrial building that could allow manufacturing, the future manufacturing tenant would be required to meet the energy demand goals of 50 percent by 2045, and the analyzed Project would be constructed to comply with Title 24 Part 6 energy requirements, including increases in on-site energy generation requirements and improved insulation, reducing energy consumption in industrial manufacturing operations.</p>
Combined Heat and Power	
<p>Facilities retire by 2040.</p>	<p>Not Applicable. The analyzed Project would not involve any existing combined heat and power facilities.</p>
Agriculture Energy Use	
<p>25 percent energy demand electrified by 2030 and 75 percent by 2045.</p>	<p>Not Applicable. The analyzed Project would not involve any agricultural uses.</p>
Low Carbon Fuels for Transportation	
<p>Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.</p>	<p>Not Applicable. The analyzed Project would not involve any production of biofuels.</p>

Action	Consistency
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane ¹³⁵ blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7 percent energy (~20 percent by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	Not Applicable. The analyzed Project would not involve any production of fuels for buildings and industry.
Non-Combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75 percent of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50 percent by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	Not Applicable. The analyzed Project would not involve any production of non-combustion methane emissions or organic waste.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Not Applicable. The analyzed Project includes a speculative industrial building that would be used for warehousing and manufacturing uses and does not propose cold storage or the use of refrigerants.

Source: Appendix A

In addition to the 2022 Scoping Plan, the City of Orange General Plan also includes goals and policies aimed at reducing GHG emissions. Table LU-1 in Section 11, *Land Use and Planning*, shows the analyzed Project's consistency with the City's General Plan.

Overall, the analyzed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

9. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

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

The discussion below is based on the Phase I Environmental Site Assessment prepared by Partner Engineering and Science Inc, dated August 2021 (included as Appendix H). The Phase I report prepared for the Project indicated no existing or past hazardous uses or contamination of the site. The report identified the site as negative for any recognized environmental condition (REC), controlled recognized environmental condition (CREC), and historical recognized environmental condition (HREC).

Impact Analysis

a) The Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.

A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the

environment if released.¹ Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that regulatory agencies believe would be injurious to the health and safety of persons or harmful to the environment. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

Construction

Construction of the Project would require heavy construction equipment (e.g., dozers, excavators, tractors). Some of the equipment 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, handled, or transported. Other materials, such as paints, adhesives, and solvents, could also result in accidental releases or spills that could pose risks to people and the environment. However, these risks are standard for the construction of development projects, and the Project would not cause greater risks than would occur on other similar construction sites. Moreover, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

In addition, construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Applicable laws and regulations include CCR, Title 8 Section 1529 (pertaining to asbestos containing materials (ACM)) and Section 1532.1 (pertaining to lead based paint (LBP)); CFR, Title 40, Part 61, Subpart M (pertaining to ACM); CCR, Title 23, Chapter 16 (pertaining to underground storage tanks (UST)); CFR, Title –9 - Hazardous Waste Control Act; CFR, Title 49, Chapter I; and Hazardous Materials Transportation Act requirements as imposed by the USDOT, CalOSHA, CalEPA and DTSC, as well as the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the Orange County Health Care Agency (OCHCA). Additionally, construction activities would require the preparation of a SWPPP, which is mandated by the National Pollution Discharge Elimination System General Construction Permit (PPP WQ-1) and enforced by the Santa Ana RWQCB. The SWPPP would include strict on-site handling rules and BMPs to minimize potential adverse effects to workers, the public, and the environment during construction, including, but not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Mandatory compliance with applicable laws and regulations related to the routine transport, use, storage and disposal of hazardous materials during construction activities at the Project site would limit potentially significant hazards to construction workers, the public, and the environment. Potential impacts would be less than significant.

¹ California Environmental Protection Agency. Available online at: <https://calepa.ca.gov/hazardous-materials-business-plan-program/hazardous-materials-business-plan-faq/#What-Is-a-Hazardous-Material>

Operation

Operation of the proposed industrial facility would not involve the routine use of substantial amounts of hazardous materials. The analyzed Project would allow for warehouse and limited manufacturing uses. While hazardous waste facilities that engage in routine transfer of hazardous materials are a conditional use under the M-1 zoning district, no off-site hazardous waste facility shall be constructed, installed, operated, or maintained in, or within 300 feet of any residential, commercial, office/professional zone or district per the City of Orange Municipal Code Chapter 17.42. Further, off-site hazardous waste facilities are prohibited in the M1 and M2 zones unless the applicant first obtains a Hazardous Waste Facility Siting Permit through the City (in accordance with Division 20, Chapter 6.5 of the California Health and Safety Code) and shows proof of all other required federal, State, county, and City permits, licenses, and approvals. Instead, the proposed use does not propose the routine use of hazardous materials and would involve the use and storage of only small quantities of potentially hazardous materials typical of those used in commercial and industrial settings, such as cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, paints, bleach, grease, and petroleum products. In other words, the Project generally would not produce significant amounts of hazardous waste or require the use or transport of hazardous waste beyond those materials typically used in industrial development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project site, creates a significant hazard to the environment or public.

Moreover, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not create a significant hazard to the public or the environment through a reasonably foreseeable upset or accident condition involving the release of hazardous materials into the environment.

Construction

While the routine use of hazardous materials during construction would not pose health risks or result in significant impacts, improper use, storage, transportation, and disposal of hazardous materials could result in accidental spills or releases of hazardous materials. BMPs would be implemented during construction as part of a SWPPP, as required by the National Pollution Discharge Elimination System Construction General Permit, (PPP WQ-1). Implementation of a SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage, refueling, and construction dewatering activities that includes secondary containment protection measures and spill control supplies;

- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Further, as previously mentioned, the Project site does not contain any known hazardous conditions that could result in the accidental upset or release of hazardous materials during project construction, specifically as part of ground disturbing activities such as grading. The Project would also contain demolition of existing structures within the Project site. The existing buildings were constructed in 1987. As such, it is unlikely that the buildings contain lead-based paint or asbestos, since these substances were regulated prior to building construction. However, removal of all materials would be handled with the safety regulations established under the National Emission Standards for Hazardous Air Pollutants (NESHAP) and State and federal regulation indicated previously. Construction would result in a less than significant impact.

Operation

As discussed above, operation of the industrial facility would not involve the routine use of substantial amounts of hazardous materials. Instead, the proposed use would involve the use and storage of small quantities of potentially hazardous materials typical of those used in commercial uses such as cleaning solvents, paints, and pesticides for landscaping, waxes, dyes, toners, paints, bleach, grease, and petroleum products. The Project would not produce significant amounts of hazardous waste and would not use or transport hazardous waste beyond those materials typically used in an urban development.

All hazardous materials used on the Project site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

Therefore, none of the Project's operational features, or the type of hazardous materials used on the Project site, would create a significant hazard to the environment or public. With adherence to existing regulations, impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

There are two schools located within one-quarter mile of the Project site. The closest schools to the Project site are Early Childhood Montessori Preschool, located at 2237 N Orange Olive Road, approximately 0.36-mile southwest of the Project site and Fletcher Mandarin Language and GATE Academy, located at 515 W

Fletcher Avenue, approximately 0.25-mile east of the Project site. However, the Project would comply with all relevant and applicable federal, State, and local laws and regulations that pertain to the release of hazardous materials. Additionally, neither of these schools are located along the truck route that would be used to travel to and from the Project, and therefore, would be at an extremely limited risk of exposure to hazardous emissions.

Construction

As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of developments and would include vehicle fuels, paints, oils, and transmission fluids. Furthermore, all such materials used would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements, and would not create a significant hazard to nearby schools. The use of hazardous materials would also be regulated by the Orange County Environmental Health Division. Additionally, construction-related emissions would be regulated by SCAQMD Rules 401 and 403.

Further, construction truck trips would utilize City-approved truck routes, which would route construction vehicles away from sensitive receptors as trucks would travel north on Glassell Street to State Route (SR) 91. Therefore, the Project's potential construction-related impacts within a one-quarter mile of an existing school caused by hazardous emissions and materials would be less than significant.

Operation

As discussed previously, operation of the proposed industrial facility would not involve the routine use of substantial hazardous materials. Instead, the proposed use would involve the use and storage of only small quantities of potentially hazardous materials such as cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial and industrial settings. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in a commercial development. Furthermore, all such materials used would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements, and would not create a significant hazard to nearby schools. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project site, would create a significant hazard to the environment or public, including nearby schools. Therefore, the use of hazardous materials and the generation of hazardous emissions through Project operation would not pose a significant hazard at nearby schools, and operational impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

d) The Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment.

The Phase I ESA prepared for the Project site (Appendix H) included a review of federal, State, and local regulatory databases and determined that the Project site was not identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Government Code Section 65962.5 defines hazardous materials sites as: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. Therefore, the Project would result in no potential impacts regarding creating a significant hazard by developing and bringing people to a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

e) The Project site not located within an airport land use plan. Additionally, the Project site is not located within two miles of a public airport. The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.

The nearest airports are the Fullerton Municipal Airport in the City of Fullerton, located approximately 7.5 miles northwest of the Project site, and the John Wayne Airport, located approximately 10 miles south of the Project site, within the City of Santa Ana. As the Project site is not in the vicinity of an airport or airport land use plan, the Project would not result in an airport-related safety hazard for people working in the Project area and impacts would not occur from implementation of the Project.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

f) The Project would not impair the implementation of or physically interfere with an adopted emergency response plans or emergency evacuation plans.

Construction

During construction, haul truck trips would transport construction debris and materials to and from the Project site; however, these trips would not impact the roadway in a way that would impede emergency evacuations. The installation of driveways and connections to existing infrastructure systems that would be implemented during construction of the Project could require the temporary closure of portions of the roadway; however, construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process.

Additionally, the City's identified evacuation routes include Santiago Canyon Road, Chapman Avenue, Serrano Avenue, Jamboree Road, and Cannon Street. The Project is not directly adjacent to roadways that have been designated by the City as evacuation routes. Implementation of the Project through the City's permitting process would ensure compliance with existing regulations and would reduce potential

construction-related emergency access impacts to a less-than-significant level. Therefore, impacts related to an emergency response or evacuation plan during construction would be less than significant.

Operation

Operation of the proposed industrial facility would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project site would be accessed by two proposed driveways from Glassell Street on the western boundary of the site. The northern driveway on Glassell Street would be 30 feet wide and would be limited to passenger vehicle access. The southern driveway on Glassell Street would be 49 feet wide and allow both truck and passenger vehicle access. Both driveways would provide ingress and egress to the Project site (See Figure 7, *Conceptual Site Plan*). In addition, internal circulation would be via a 28-foot-wide driving aisle that would double as the fire lane. The Project site driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

g) The Project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.

The Project site is not located in a fire hazard zone (CAL FIRE, 2025). Additionally, the Project site is not located within an evacuation plan area, nor does it abut any generalized evacuation routes (Orange City Fire Department, n.d.). The Project site is located in an urban area, is fully developed and is surrounded by developed areas. Implementation of the Project would be required to adhere to the California Fire Code, as adopted by the City, and would be reviewed by the City's Building and Safety Services Division during the permitting process to ensure that the Project meets the fire protection requirements. As a result, the analyzed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

PPP WQ-1: NPDES/SWPPP. Listed below in Section 10, *Hydrology and Water Quality*.

10. HYDROLOGY AND WATER QUALITY		<div> <div>Potentially Significant Impact</div> <div>Less than Significant With Mitigation Incorporated</div> <div>Less Than Significant Impact</div> <div>No Impact</div> </div>			
<i>Would the project:</i>					
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
	i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii) Increase the rate or amount of surface runoff in a manner which would result in flooding in- or off-site;	☐	☐	☒	☐
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
	iv) Impede or redirect flood flows?	☐	☐	☒	☐
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
(f)	Result in the potential for discharge of stormwater to affect the beneficial uses of the receiving waters from construction activities or post-construction activities?	☐	☐	☒	☐
(g)	Result in a potential for discharge of stormwater pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks or other outdoor work areas?	☐	☐	☒	☐
(h)	Create the potential for significant changes in the flow velocity or volume of stormwater runoff to cause environmental harm?	☐	☐	☒	☐

The discussion below is based on the Preliminary Drainage Report prepared by Huitt-Zollars, Inc. in September 2024 (included as Appendix I) and the Preliminary Priority Water Quality Management Plan (PWQMP) prepared by Huitt-Zollars, Inc. in September 2024 (included as Appendix J).

Impact Analysis

a) The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

The Santa Ana Regional Water Quality Control Board (RWQCB) would have jurisdiction over the groundwater quality and surface water discharges for the analyzed Project. Water quality standards for all ground and surface waters overseen by the Santa Ana RWQCB are documented in its Basin Plan, and the regulatory program of the Santa Ana RWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

The site is currently developed with three office buildings and asphalt hardscape. Existing drainage on the Project site drains southwest towards the public storm drain system in Glassell Street (Appendix I).

Construction

Construction activities include demolition, site preparation, grading, paving, and installation of new landscaping that would expose and loosen sediment and would have the potential to degrade surface and receiving water quality via stormwater runoff. In addition, construction vehicles and equipment are prone to tracking soil from work areas to paved roadways, which could exacerbate sedimentation of receiving waters. Pollutants of concern during construction activity generally include sediment, trash, petroleum products, concrete water, sanitary waste, and chemicals.

Construction of the Project would disturb more than one acre of soil; therefore, the analyzed Project would be required to obtain coverage under the NPDES General Permit for Discharges of Stormwater Associated with Construction Activity, NPDES No. CAS000002 (Construction General Permit).

The analyzed Project would also be required to comply with the City of Orange's Local Implementation Plan (LIP). The LIP outlines protocols for citywide projects to implement in order to contribute to regional stormwater pollution control efforts and adhere to the requirements of applicable NPDES permits required for the project.

As described above, the Project would be required to comply with NPDES Construction General Permit regulations and the LIP, which require the preparation and implementation of a SWPPP, included as PPP WQ-1. As part of the SWPPP, erosion and sediment control measures would be included to minimize potential pollutants from entering stormwater during construction. These measures include the use of construction BMPs to ensure that impacts related to degradation of water quality would be less than significant. Erosion and Sediment control BMPs used to prevent the degradation of water quality in the construction area may include the use of:

- Silt fences;
- Sediment/desilting basins;
- Sediment traps;
- Check dams;
- Fiber rolls;
- Gravel bag berms;

- Sandbag barriers;
- Straw bale barriers;
- Street sweeping and vacuuming; and/or
- Storm drain inlet protection.

Other BMPs that could be used to enhance erosion and sediment control include scheduling to avoid wet weather events, preserving existing vegetation, and placing cover material over exposed soil. BMPs would also include practices for proper handling of chemicals such as avoidance of fueling at the construction site and overtopping during fueling, and installation of containment pans. Adherence to the existing requirements and implementation of BMPs in compliance with the City's permitting requirements would ensure that activities associated with construction would not violate any water quality standards. As a result, impacts related to the degradation of water quality during construction of the analyzed Project would be less than significant.

Operation

Currently, the site is approximately 73 percent impervious (Appendix J). Implementation of the analyzed Project would increase the impervious surface area on the Project site to approximately 89 percent (Appendix J). The Project includes the operation of an industrial building. Project operation would introduce the potential for pollutants such as chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, operation of the analyzed Project would be required to comply with Orange County MS4 Permit requirements, which are included in the City's Municipal Code Chapter 7.01, *Water Quality and Stormwater Discharges*.

Section 7.01.050 of the Orange Municipal Code requires that new development projects and significant redevelopment projects adhere to the City's LIP prepared as part of a compliance program to satisfy the requirement of the area-wide Drainage Area Management Plan (DAMP) and the Orange County MS4 Permit. A PWQMP has been developed (included as Appendix J) per these requirements and recommends low impact development (LID) site design, source control, and treatment control BMPs to be incorporated into the Project. The LID site design would provide infiltration of runoff into landscaped areas. The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs that would treat stormwater runoff. The analyzed Project is designed such that the runoff from the Project site would be pretreated by grate/catch basin inlet filters prior to entering the underground infiltration chamber for treatment before draining to the public storm drain system in Glassell Street (Appendix J).

Additionally, under Section 7.01.060 of the Orange Municipal Code, the Project would be required to implement a Final Priority Water Quality Management Plan (FWQMP), included as PPP WQ-2, to control pollutant discharges. Implementation of the FWQMP would require use of LID features, pollutant source control features, and pollutant treatment control features, which would ensure that the Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality. Therefore, operational impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

The City's Urban Water Management Plan (UWMP) states that the City relies for its water supplies on 77 percent groundwater, 18 percent imported water, and 5 percent surface water. The main source of the City's water supply is the Orange County Groundwater Basin. Groundwater from the Orange County Groundwater Basin is managed by the Orange County Water District (OCWD), which manages basin water supply through the Basin Production Percentage (BPP). The BPP is set based on groundwater conditions, availability of imported supplies, and precipitation.

Water supply estimates are characterized in part by land use projections. The Project is consistent with the existing Light Industrial (LI) land use designation. As discussed further in Section 19, *Utilities and Service Systems*, the Project's water usage has been accounted for within the UWMP projections. Additionally, the amount of groundwater pumped is limited by the OCWD and the Project would not directly pump water from the Project area, as water supplies would be provided by OCWD.

As described earlier, pre-development conditions contain approximately 73 percent impervious area, while post-development conditions would contain approximately 89 percent impervious area (Appendix J). The Project design includes an underground infiltration system that would capture and filter runoff before draining to the public storm drain system (Appendix J). As a result, the analyzed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Thus, the analyzed Project would have a less-than-significant impact.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) i) The Project would not result in substantial erosion or siltation on- or off-site.

Construction

Construction and demolition activities would disturb and expose soil, which could be moved by wind and water, resulting in erosion and sedimentation of stormwater runoff. However, the Project site does not include any slopes, which reduces the construction erosion potential. As discussed above under 10(a), implementation of a SWPPP, included as PPP WQ-1, and the use of construction BMPs, as required by the Orange County MS4 Permit and City's LIP, would ensure that the Project's potential construction impacts related to substantial erosion or siltation on-or off-site and resulting in a degradation of water quality would be less than significant.

Operation

During operation, the analyzed Project would include landscaping adjacent to the industrial building that would inhibit erosion, leaving no substantial areas of bare or disturbed soil on-site subject to erosion. In addition, as discussed above under 10(a), the Project would be required to implement a FWQMP, included as PPP WQ-2, that would identify operational BMPs to ensure that operation of the industrial facility would not result in erosion or siltation. With implementation of these regulations, the Project's potential operational impacts related to erosion or siltation on-site or off-site would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) ii) The Project would not increase the rate or amount of surface runoff in a manner which would result in flooding in- or off-site.

The Project site does not include, and is not adjacent to, a natural stream or river. Currently, the site is approximately 73 percent impervious (Appendix J). Implementation of the analyzed Project would increase the impervious surface area on the Project site to approximately 89 percent (Appendix J). Existing drainage on the Project site drains southwest towards the public storm drain system in Glassell Street (Appendix I). Runoff from the Project would be conveyed to an underground infiltration system that would capture and filter runoff before draining to the public storm drain system in Glassell Street (Appendix J). Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the on-site BMPs such as the infiltration system would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the off-site drainage system and would not result in an increase in runoff that could result in on or off-site flooding. In addition, the analyzed Project would include landscaping to slow surface runoff. Table WQ-1, *Comparison of Existing and Project Peak Runoff Rates*, below, shows that the increase in peak runoff with the analyzed Project as compared to the existing condition would not be substantial and would not result in flooding in or off-site. Therefore, potential impacts related to flooding as a result of surface runoff increase would be less than significant.

Table WQ-1: Comparison of Existing and Project Peak Runoff Rates

Existing/Proposed/ Percent Change	24-Hour Peak Runoff (cfs)
10-Year Storm Event	
Existing	26.21
Proposed	26.39
Percent Change	+0.69%
25-Year Storm Event	
Existing	31.57
Proposed	32.49
Percent Change	+2.91%
100-Year Storm Event	
Existing	40.55
Proposed	42.38
Percent Change	+4.51%

Source: Appendix I

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) iii) The Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

Currently, the site is approximately 73 percent impervious (Appendix J). Implementation of the analyzed Project would increase the impervious surface area on the Project site to approximately 89 percent (Appendix J). As shown in Table WQ-1, the increase in peak runoff with the analyzed Project as compared to the existing condition would not be substantial. As described previously, the Project site would maintain the existing drainage pattern of the Project site. Surface runoff from the Project site would be pretreated by grate/catch basin inlet filters prior to entering the underground infiltration chamber for treatment and percolation into the ground before draining to the public storm drain system in Glassell Street (Appendix J). The proposed underground infiltration system for surface runoff treatment would have a maximum volume of 32,083 cubic feet (Appendix I). During the 100-year storm event, the system would begin to overflow to the outlet once design capture volume (DCV) is reached. The proposed drainage plan meets guidelines for a 100-year, 24-hour storm event, as set by the County of Orange (Appendix I). In addition, the analyzed Project would include landscaping to slow surface runoff. As such, the Project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) iv) The Project would not impede or redirect flood flows.

According to the Federal Emergency Management Agency (FEMA) Map 06059C0153J, the Project site is located within Flood Zone X (FEMA, 2009). The majority of the Project site is within an area of minimal flood hazard, with the western portion of the site being located within an area with reduced flood risk due to levee (FEMA, 2009). The Project would be required to comply with the applicable flood damage prevention construction standards under Municipal Code Section 15.60.160. The City would review the Project permit applications to ensure the proposed development would not be subject to significant flood hazard and that structures would be floodproofed. The analyzed Project would install an underground infiltration chamber, which would be designed to retain and treat stormwater to allow percolation of the DCV into the groundwater before conveying storm flows to the public storm drain system in Glassell Street (Appendix J). As described previously, the proposed drainage system has been sized to accommodate flows from a 100-year, 24-hour storm event and would not exceed the capacity of the existing stormwater drainage system. Thus, the Project would not impede or redirect flood flows, and potential impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

d) The Project would not risk release of pollutants due to inundation in flood hazard, tsunami, or seiche zones.

As described above, the Project site is located within Flood Zone X (FEMA, 2009). The majority of the Project site is within an area of minimal flood hazard, with the western portion of the site being located within an area with reduced flood risk due to levee (FEMA, 2009). The Project would be required to comply with the applicable flood damage prevention construction standards under the City's Municipal Code Section 15.60.160. The City would review the Project permit applications to ensure the proposed development would not be subject to significant flood hazard and that structures would be floodproofed. As discussed in the Geotechnical Exploration Report, majority of the site is mapped within a dam inundation zone associated with Prado Dam (Appendix F). However, due to the location and distance of the site from Prado Dam, the potential for earthquake-induced flooding to occur due to a failure of this dam is considered low (Appendix F). Thus, the Project site is not located within a flood hazard area that could be inundated with flood flows and result in release of pollutants, and impacts would be less than significant.

Tsunamis are tidal waves generally caused by shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The Project site is located approximately 15 miles from the ocean shoreline. Based on the distance between the Project site and the Pacific Ocean, the Project is not at risk of inundation from tsunami. Therefore, the Project would not pose a risk of release of pollutants from inundation from a tsunami. No impacts would occur.

Seiche is a phenomenon that occurs when seismic ground shaking induces standing waves within a closed body of water. Seiches may cause retention structures to fail and flood downstream properties. There are no enclosed water bodies near the Project site to pose a flood hazard to the site resulting from a seiche (Appendix F). Therefore, the Project would not pose a risk of release of pollutants from inundation from seiche. No impact would occur.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

e) The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit, included as PPP WQ-1, and the City's LIP would serve to ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Thus, construction of the Project would not conflict or obstruct implementation of a water quality control plan.

Also, as described previously, the analyzed Project would be required to implement a FWQMP (per PPP WQ-2) that would comply with the City's LIP. Compliance with the LIP would be ensured through the City's permitting process, as well as through post-construction BMP inspections and verifications. Therefore, operation of the analyzed Project would not conflict with or obstruct implementation of a water quality control plan.

As discussed further in Section 19, *Utilities and Service Systems*, the Project's water demand has been accounted for in the City of Orange 2020 UWMP, since the Project is consistent with the Project site's existing land use designation. The 2020 UWMP determined that water supply and demands will be met, and the City would monitor groundwater withdrawals so as to not overdraft supplies. Therefore, the Project would not conflict with the OCWD groundwater management plan.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

f) The Project would not result in the potential for discharge of stormwater to affect the beneficial uses of the receiving waters from construction activities or post-construction activities.

As discussed above, the Project would route stormwater runoff into an underground infiltration system for treatment and percolation of the DCV into the ground before stormwater is discharged into the public system (Appendix J). Furthermore, the downstream receiving waters for the Project site are not 303(d) listed for any pollutants in this section of the watershed (Appendix J). The PWQMP describes the implementation of stormwater BMPs including the use of the proposed infiltration system to help the site meet storm water quality treatment requirements in accordance with the MS4 Permit. Therefore, the Project would not result in a discharge of stormwater that would adversely affect the beneficial uses of the receiving waters. Impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

g) The Project would not result in a potential for discharge of stormwater pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks or other outdoor work areas.

As discussed above in Section 9, *Hazards and Hazardous Materials*, operation of the proposed industrial facility with warehousing and manufacturing uses would require transport, storage, use, and disposal of a limited amount of hazardous materials. Due to the nature of the Project, vehicle and equipment fueling and maintenance, waste handling, and loading dock activities are anticipated to occur on the site. However, the analyzed Project would be required to comply with federal, State, and local federal regulations regarding the use, storage, handling, and disposal of hazardous materials as described in Section 9, *Hazards and Hazardous Materials*. Therefore, compliance with existing regulations would ensure impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

h) The Project would not create the potential for significant changes in the flow velocity or volume of stormwater runoff to cause environmental harm.

Surface runoff from the Project site would be pretreated by grate/catch basin inlet filters prior to entering the underground infiltration chamber for treatment before draining to the public storm drain system in Glassell Street (Appendix J). As shown in Table WQ-1, the increase in peak runoff with the analyzed Project as compared to the existing condition would not be substantial. As described previously, the proposed

drainage system was determined to be able to accommodate a 100-year, 24-hour storm event, as required per Orange County guidelines. In addition, the analyzed Project would include landscaping to slow surface runoff. Therefore, impacts related to volume of stormwater would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

Existing Plans, Programs, or Policies

PPP WQ-1: NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building and Safety Division and Public Works Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP WQ-2: FWQMP. Prior to the approval of the Grading Plan and issuance of Building and Grading Permits a FINAL Priority Water Quality Management Plan (FWQMP) shall be submitted to and approved by the City. The FWQMP shall identify all Post-Construction, Site Design, Source Control, Low Impact Development, and any Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize any potential adverse effects on receiving waters.

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

Impact Analysis:

a) The Project would not physically divide an established community.

The Project site is a fully developed urban infill site that currently contains three office buildings, a paved lot, and ornamental landscaping. The Project site is located in a highly developed area and is surrounded on all sides by streets, a railway, and industrial, commercial, and residential development. In addition, the Project would not change any roadways or install any infrastructure that would result in physical division of a community. Thus, no impacts related to physical division of an established community would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The documents regulating land use for the Project site and immediate vicinity are the City's General Plan and the City of Orange Municipal Code. The Project's relationship to each planning document is described below.

Municipal Code

The Project site has an existing zoning designation of Industrial Manufacturing (M-2), which is intended to provide continuation and development of heavy manufacturing industries in locations where they are compatible with and will not adversely impact adjacent land uses. As per Section 17.13.030 of the Municipal Code, warehouse facilities, including the storage of manufactured goods for distribution, are a permitted use within the M-2 zone. As previously shown in Table AES-1, the Project would comply with the development standards per City of Orange Municipal Code Chapter 17.20, *Industrial Districts*. Therefore, no impact related to Municipal Code inconsistency would occur.

General Plan

The Project site has an existing General Plan land use designation of Light Industrial (LI), which permits a maximum FAR of 1.0. The LI designation allows for manufacturing, processing, and goods distribution. The Project would be built out to an FAR of 0.57 and is an allowed use within the LI land use designation.

Additionally, the Project would be required to comply with the goals and policies of the City General Plan. As shown in Table LU-1, the Project would be consistent with the land use designation, goals, and policies of the City of Orange General Plan. As such, no impact related to General Plan inconsistency would occur.

Table LU-1: City of Orange General Plan Consistency

Policy	Consistency
Policy LU-1.4: Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development.	Consistent. As shown in Table AES-1, the Project complies with development standards within the M-2 zoning designation. Further, the Project would be compatible with surrounding light industrial uses.
Policy LU-3.4: Discourage commercial and industrial enterprises that have significant adverse soil, air, water, or noise impacts.	Consistent. As evaluated throughout this IS/MND, the Project would not result in significant impacts under the thresholds analyzed.
GOAL LU-4.0: Encourage high quality, sustainable, industrial and office uses that provide jobs and revenue; support environmental quality; and promote options for adaptive re-use.	Consistent. The Project proposes the demolition of the existing office buildings totaling 191,127 SF for the development of one 298,918 SF industrial building, which would provide revenue to the city. The Project would comply with all environmental-related regulations, as discussed in each environmental topic section of this document.
Policy LU-4.1: Maximize use of limited land resources for industrial and office uses within areas designated Light Industrial or Industrial on the Land Use Policy Map.	Consistent. The Project proposes to construct an industrial warehouse with manufacturing uses, which is consistent with the intended uses of the Light Industrial (LI) land designation and Industrial Manufacturing (M-2) zoning designation. The LI land use designation allows a maximum FAR of 1.0, and the Project would be built out to an FAR of 0.57.
Policy LU-4.3: Protect residents and the environment from potential adverse soil, air, water, and noise impacts of industrial operations.	Consistent. The Project would result in less than significant impacts related to air, water, and noise as identified in each environmental topic of this document. Impacts related to soil would be less than significant as detailed in Section 9, <i>Hazards and Hazardous Materials</i> .
Policy LU-4.4: Encourage development of mixed office, industrial, and support commercial uses in areas designated Light Industrial on the Land Use Policy Map.	Consistent. The Project would construct an industrial building with warehouse and manufacturing uses, which is consistent with intended uses within the LI land use.
Policy LU-6.1: Ensure that new development is compatible with the style and design of established structures and the surrounding environment.	Consistent. The Project is located in an urban area and would construct a warehouse and manufacturing facility surrounded by residential uses to the north and east, and commercial and industrial uses to the south and west. As shown in Table AES-1, the Project would be consistent with the development standards for the M-2 zoning designation. Additionally, the proposed building

Policy	Consistency
	onsite would be set back more than 50 feet from the nearest residential uses. Overall, the Project would be compatible with surrounding urban uses that include industrial, commercial, and residential developments.
Policy LU-6.2: In areas where residential uses abut commercial or industrial land uses, use buffering techniques to improve compatibility. Such techniques include the use of setbacks, screening, soundwalls with pedestrian access, and appearance standards.	Consistent. There are existing residential uses to the north of the Project site, along Fletcher Avenue. The Project would construct a warehouse and manufacturing facility that has been designed to orient operations away from residences. The proposed building would be setback approximately 18 feet from Fletcher Avenue and include landscaping, consisting of existing mature trees and new trees, to screen the proposed building from residences across the street. Further, the truck court would be located to the south of the proposed building, away from the residences along Fletcher Avenue which would be buffered by the building itself.
Policy LU-6.5: Reduce pollutant runoff from new development and urban runoff to the maximum extent practicable.	Consistent. As discussed in Section 10, <i>Hydrology and Water Quality</i> , the Project would be required to incorporate water quality measures with LID site design during Project operations and treatment control BMPs during all construction and grading activities to reduce runoff.
Policy LU-6.6: Enhance the walkability of both new and current development.	Consistent. The Project would provide up to 14 short-term bicycle parking spaces and six long-term bicycle parking spaces on-site. The Project would maintain the existing sidewalk along Glassell Street. A pedestrian walkway would be installed connecting the office area with Glassell Street.
Policy LU-6.8: Maximize landscaping along streetscapes and within development projects to enhance public health and environmental benefits.	Consistent. The Project would provide landscaping along the perimeter of the property as well as throughout the parking lot. The design specifications would be required to comply with the Landscaping Ordinance (City of Orange Municipal Code Chapter 16.50).
Policy LU-6.9: Restrict development in areas where exposure to hazards such as flood, erosion, liquefaction, dam failure, hazardous materials, and toxic gases cannot be mitigated to reduce risk to residents and liability to the City.	Consistent. As described in Section 10, <i>Hydrology and Water Quality</i> , the Project site is located within Flood Zone X. The majority of the Project site is in an area of minimal flood hazard, with the western portion of the Project site located within an area with reduced flood risk due to levee. Additionally, as discussed in Section 7, <i>Geology and Soils</i> , the Project site is not susceptible to liquefaction.

Policy	Consistency
<p>Policy LU-6.10: Mitigate adverse air, noise, circulation, and other environmental impacts caused by new development adjacent to existing neighborhoods through use of sound walls, landscaping buffers, speed limits, and other traffic control measures.</p>	<p>Consistent. There are existing residential uses to the north of the Project site, along Fletcher Avenue. The Project would construct a warehouse and manufacturing facility that has been designed to orient operations away from residences. The proposed building would be setback approximately 18 feet from Fletcher Avenue and include landscaping, consisting of existing mature trees and new trees, to screen the proposed building from residences across the street. Further, the truck court would be located to the south of the proposed building, away from the residences along Fletcher Avenue and screened by an 8-foot concrete wall to reduce noise. Vehicle access would be limited to Glassell Street and the use of Fletcher Avenue would be limited to emergency vehicle access only. In addition, the Project would result in less than significant impacts related to air quality, noise, and traffic as identified in each environmental topic section of this document.</p>
<p>Policy CM-1.7: Consolidate driveways along roadways that provide access to commercial uses to minimize side street interruption and promote smooth traffic flows.</p>	<p>Consistent. The Project site is accessible via two driveways along Glassell Street, classified as a primary arterial. Fire department access would be provided via an emergency vehicle access driveway located along East Fletcher Avenue.</p>
<p>Policy CM-5.2: Plan for and design parking facilities throughout the City that are adequate to meet demand, but also consider land use-parking efficiencies, and the surrounding natural and built environment.</p>	<p>Consistent. The Project would be required to provide 247 parking stalls. The Project proposes to provide a total of 247 parking stalls.</p>
<p>GOAL GM-1.0: Reduce traffic congestion within the City.</p>	<p>Consistent. As discussed in Section 17, <i>Transportation</i>, the Project would generate fewer daily trips than the existing use on the site.</p>
<p>Policy GM-1.2: Ensure completion of transportation improvements as agreed upon by the City and developer prior to completion of a development project.</p>	<p>Consistent. The Project does not propose or require any transportation improvements. As discussed in Section 17, <i>Transportation</i>, the Project would generate fewer daily trips than the existing use on the site.</p>
<p>Policy GM-1.3: Ensure that new development pays its fair share of street improvement costs, including regional traffic mitigation. New revenues generated from Measure M, if available, shall not be used to replace private developer funding which has been omitted for any project.</p>	<p>Consistent. The Project applicant would be required to pay applicable fees in accordance with City regulations.</p>

Policy	Consistency
Policy GM-1.5: Require new development projects to link issuance of building permits for the appropriate portion of the development plan to roadway improvements required to achieve the appropriate LOS. Monitor the implementation of this requirement for each new development project on an annual basis.	Consistent. As discussed in Section 17, <i>Transportation</i> , the Project would generate fewer daily trips than the existing use on the site. The Traffic Impact Analysis (included as Appendix L) identified that the Project would meet the City's thresholds for traffic operations and no roadway improvements would be required.
Policy GM-1.7: Promote the expansion and development of alternative methods of transportation.	Consistent. The Project would provide a total of 20 bicycle parking spaces as well as 76 electric vehicle capable parking spaces, which would encourage alternative methods of transportation.
Policy GM-1.9: Ensure that new developments incorporate non-motorized and alternative transit amenities such as bike racks, bus benches and shelters, and pedestrian connections.	
Policy GM-1.12: Promote traffic reduction strategies through the measures adopted within the City's Transportation Demand Management (TDM) Ordinance.	Consistent. As mentioned above, the Project would generate fewer daily trips than the existing use on the site. Additionally, the Project would provide a total of 20 short-term and long-term bicycle parking spaces as well as 76 electric vehicle capable parking spaces on-site, which would encourage alternative methods of transportation. Therefore, the Project would promote traffic reduction strategies.
GOAL NR-2.0: Protect air, water, and energy resources from pollution and overuse.	Consistent. The Project would result in less than significant impacts related to air, water, and energy as identified in each environmental topic section of this document.
Policy NR-2.1: Cooperate with the South Coast Air Quality Management District (SCAQMD) and other regional agencies to implement and enforce regional air quality management plans.	Consistent. The Project is consistent with the General Plan land use designation and maximum allowed FAR. In addition, as described in Section 3, <i>Air Quality</i> , Project impacts related to emissions would be less than significant with the Project's incorporation of MM AQ-1, which requires the use of Tier 4 Final or superior equipment during construction. Therefore, the Project is within the AQMP projections for the area.
Policy NR-2.2: Support alternative transportation modes, alternative technologies, and bicycle- and pedestrian-friendly neighborhoods to reduce emissions related to vehicular travel.	Consistent. The Project would provide a total of 20 short-term and long-term bicycle parking spaces as well as 76 electric vehicle capable parking spaces on-site, which would encourage alternative methods of transportation. In addition, as discussed in Section 3, <i>Air Quality</i> , emissions of criteria pollutants during construction and operation would be below SCAQMD thresholds with the Project's incorporation of MM AQ-1. As discussed in Section 8, <i>Greenhouse Gas Emissions</i> , emissions of GHGs

Policy	Consistency
	would be below SCAQMD thresholds and would be less than significant.
Policy NR-2.3: Reduce the amount of water used for landscaping through the use of native and drought-tolerant plants, proper soil preparation, and efficient irrigation systems as parks and other City facilities are built or renovated.	Consistent. The Project would use drought-tolerant plants as listed in Figure 10, <i>Landscape Plan</i> . Development of the landscape and irrigation plan would be required to comply with regulations and standards under Orange County's Water Efficient Landscape Ordinance.
Policy NR-2.4: Encourage the production, distribution, and use of recycled and reclaimed water for landscaping projects, while maintaining urban runoff water quality objectives.	Not applicable. No existing recycled water laterals exist within the Project vicinity. However, as discussed below, use of construction and operational BMPs would minimize stormwater pollutants, maintaining urban runoff quality.
Policy NR-2.5: Continue to work toward local and regional waste-reduction and diversion/ recycling goals and promote public education programs.	Consistent. The Project would be required to recycle 65 percent of construction waste and 75 percent of operational waste pursuant to the CALGreen Building Code and AB 341, respectively.
Policy NR-2.6: Encourage sustainable building and site designs for new construction and renovation projects.	Consistent. The Project would be required to comply with the 2025 Building Energy Efficiency Standards pursuant to Title 24.
Policy NR-2.11: Protect the ecological integrity and overall health of Orange's watersheds.	Consistent. As required under the MS4 Permit, the Project would be required to implement BMPs through a SWPPP and WQMP. Therefore, the Project would not adversely impact stormwater flowing into the local watersheds and groundwater.
Policy NR-2.12: Cooperate with water supply agencies to protect the quantity and quality of local groundwater supplies.	Consistent. Use of construction and operational BMPs would maintain stormwater quality, which may infiltrate into the local groundwater. In addition, the Project would be consistent with the existing land use and therefore consistent with projected water demands in the City's UWMP.
Policy NR-2.13: Control surface runoff water discharges into the stormwater conveyance system to comply with the City's National Pollutant Discharge Elimination System (NPDES) Municipal Permit and other regional permits issued by the Santa Ana Regional Water Quality Control Board.	Consistent. As discussed in Section 10, <i>Hydrology and Water Quality</i> , the Project would be required to incorporate water quality measures with LID site design and treatment control BMPs during all construction and grading activities to reduce runoff. The Project proposes to treat runoff on-site through grate/catch basin inlet filters prior to entering the underground infiltration chamber for treatment before stormwater is discharged into the public system.
Policy NR-2.14: Reduce pollutant runoff from new development by requiring use of the most low development impact practices and effective Best Management Practices (BMPs) currently available.	
Policy NR-2.15: Minimize the amount of impervious surfaces and associated urban runoff pollutants in	Consistent. As described in Section 10, <i>Hydrology and Water Quality</i> , the Project would increase the amount of impervious surface on-site from 73

Policy	Consistency
new development and significant redevelopment throughout the community.	percent to 89 percent. As discussed above, the Project would also include design features and BMPs to reduce runoff pollutants. Further, the Project would maintain the existing on-site drainage pattern and use landscaping to slow surface runoff. Runoff would be pretreated on-site using grate/catch basin inlet filters before entering the underground infiltration chamber for treatment prior to discharge into the public system.
GOAL NR-3.0: Prepare for and adapt to the effects of climate change and promote practices that decrease the City's contribution to climate change.	Consistent. The Project would be required to be developed per Title 24 requirements, which would implement energy efficient building standards. In addition, the Project would not result in significant GHG emissions.
Policy NR-4.3: Reduce the impact of urban development on important ecological and biological resources.	Consistent. The existing Project site is fully developed with three 2-story office buildings on a paved lot. Therefore, buildout of the Project would not adversely impact any ecological or biological resources.
GOAL PS-1.0: Protect residents and businesses from seismic hazards and other geologic constraints.	Consistent. The Project would comply with all applicable CBC regulations, minimizing potential building damage and risk to human life from seismic hazards.
Policy PS-1.1: Minimize the potential loss of life and damage to structures that may result from an earthquake.	
Policy PS-2.4: Employ strategies and design features that will reduce the amount of impervious surface (i.e. paved area) within new development projects.	Consistent. The Project would increase the amount of impervious surface on-site from 73 percent to 89 percent. However, the Project would incorporate water quality measures, including LID site design and treatment control BMPs during construction and grading activities to reduce runoff. Further, the Project would maintain the existing drainage pattern and use landscaping to slow surface runoff. Runoff would be pretreated on-site using grate/catch basin inlet filters before entering the underground infiltration chamber for treatment prior to discharge into the public system.
GOAL PS-4.0: Minimize risks to life, property, and the environment associated with producing, using, storing, or transporting hazardous materials.	Consistent. As discussed in Section 9, <i>Hazards and Hazardous Materials</i> , mandatory compliance with applicable laws and regulations related to the routine transport, use, and disposal of hazardous materials during construction and operational activities at the Project site would limit potentially significant hazards. A Phase I ESA prepared for the Project site had determined no existing or past hazardous uses or contamination of the site. The

Policy	Consistency
	report identified the site as negative for any REC, CREC, and HREC. Nonetheless, with mandatory compliance with all applicable federal, state, and local laws and regulations, Project would be less than significant.
Policy PS-4.1: Assess potential risks of disposing, transporting, manufacturing and storing existing hazardous materials, and develop appropriate mitigation measures in case of accidents.	Consistent. As discussed in Section 9, <i>Hazards and Hazardous Materials</i> , a Phase I ESA had been conducted at this site, which indicated no existing or past hazardous uses or contamination of the site. The report identified the site as negative for any REC, CREC, and HREC. Nonetheless, with mandatory compliance with all applicable federal, state, and local laws and regulations, Project impacts related to the disposing, transporting, manufacturing and storing existing hazardous materials would be less than significant. Therefore, no mitigation measures are required.
Policy PS-4.2: Prohibit new disposal, transport, manufacture, and storage of hazardous materials within the City without a mitigation plan in case of accidents. Hospitals meeting current state and federal standards are exempt.	Consistent. Under the jurisdiction of the County of Orange Environmental Health Division, the Project would be required to disclose hazardous materials used on-site and to develop a Hazardous Materials Business Emergency Plan if reported quantities of materials are over a specified threshold.
Policy PS-4.3: Identify hazardous materials dumpsites, and ensure that the sites are cleaned in conformance with applicable federal and state laws prior to the establishment of new uses.	Consistent. As discussed in Section 9, <i>Hazards and Hazardous Materials</i> , the Project site does not contain any known hazardous conditions. The existing buildings proposed for demolition were constructed in 1987, after regulations for lead-based paint and asbestos had been enacted. Should any hazardous materials be identified on-site, they would be removed in compliance with NESHAP safety regulations and all applicable federal, state, and local requirements.
Policy PS-4.4: Ensure that the public is protected from fires, noxious fumes, and other hazards within the City's industrial area.	Consistent. The Project-specific fire site plan would be reviewed and approved by the Fire Department to ensure adequate levels of protection. As previously mentioned, mandatory compliance with applicable laws and regulations would limit the release of noxious fumes and other hazardous on-site.
Policy PS-6.8: Establish and maintain optimal emergency response times for fire safety. Require new development to ensure that City response times and service standards are maintained.	Consistent. As discussed in Section 15, <i>Public Services</i> , the Project is not anticipated to result in a substantial demand in public services. In addition, the Project developer would be required to pay property taxes that may be used to fund improvements and added resources, as needed.

Policy	Consistency
Policy PS-7.2: Promote and integrate crime-preventive characteristics and design features into all phases of the planning and development process.	Consistent. The Project would be required to comply with Chapter 15.52, <i>Building Security Standards</i> , of the Municipal Code. The Project would include the installation of parking lot lights, an 8-foot-high screen wall with two 8-foot-tall steel sliding access gates around the truck court south of the building, and an 8-foot-tall tube steel fence along the western and remaining southern boundary of the site to the east and west of the screen wall. A sliding metal gate is also proposed on the Project driveway along the eastern boundary of the Project site. Knox padlocks would be provided for all gates. The proposed landscaping would also screen the perimeter of the Project.
Policy PS-7.3: Maximize natural surveillance through physical design features, including, but not limited to, visible entryways from surrounding structures and businesses; well-defined and visible walkways and gates; well-lighted driveways, walkways, and exteriors; and landscaping that preserves or enhances visibility.	
Policy PS-7.6: Continue to involve the Orange Police Department in the project design and review process.	Consistent. As mentioned above, the Project would provide on-site lighting, screen walls, and fencing in order to limit security issues. In addition, the Crime Prevention Unit would review and approve site plans as necessary.
Policy N-1.2: Encourage new development projects to provide sufficient spatial buffers to separate excessive noise generating land uses and noise-sensitive land uses.	Consistent. There are existing residential uses to the north of the Project site, along Fletcher Avenue. The Project would construct a warehouse and manufacturing facility that has been designed to orient operations away from residences. The proposed building would be setback approximately 18 feet from Fletcher Avenue. Further, the truck court would be located to the south of the proposed building, away from the residences along Fletcher Avenue and screened by an 8-foot concrete wall to reduce noise.
Policy N-1.4: Ensure that acceptable noise levels are maintained near noise-sensitive uses.	Consistent. As discussed in Section 13, <i>Noise</i> , the noise levels from Project construction and operation at the nearest off-site noise-sensitive receptors would not exceed the applicable thresholds and impacts would be less than significant.
Policy N-6.1: Encourage the design and construction of industrial uses to minimize excessive noise through project design features that include noise control.	Consistent. As mentioned above, the Project would include an 8-foot-tall concrete wall on the south side of the proposed building to screen noise from the truck court. Additionally, as discussed in Section 13, <i>Noise</i> , construction and operational noise impacts would be less than significant.
Policy N-6.2: Encourage industrial uses to locate vehicular traffic and operations away from abutting residential zones as much as possible.	Consistent. There are existing residential uses to the north of the Project site, along Fletcher Avenue. The Project would construct a warehouse and

Policy	Consistency
	manufacturing facility that has been designed to orient operations away from residences. The proposed building would be setback approximately 18 feet from Fletcher Avenue. Further, the truck court would be located to the south of the proposed building, away from the residences along Fletcher Avenue and screened by an 8-foot concrete wall to reduce noise. Vehicle access would be limited to Glassell Street and the use of Fletcher Avenue would be limited to emergency vehicle access only.
Policy N-7.1: Schedule City maintenance and construction projects so that they generate noise during less sensitive hours.	Consistent. Project construction would occur within the hours allowed by the City of Orange Municipal Code Section 8.24.050, which states that construction shall occur only between the hours of 7:00 a.m. and 8:00 p.m. Monday through Saturday, and from 9:00 a.m. to 8:00 p.m. on Sundays and federal holidays.
Policy N-7.2: Require developers and contractors to employ noise minimizing techniques during construction and maintenance operations.	Consistent. As mentioned above, the Project would comply with the construction hours specified in the City's Noise Ordinance. During operations, the Project would include an 8-foot-tall concrete wall on the south side of the proposed building to screen noise from the truck court. Additionally, as discussed in Section 13, <i>Noise</i> , construction and operational noise impacts would be less than significant, without requiring mitigation.
Policy N-7.3: Limit the hours of construction and maintenance operations located adjacent to noise-sensitive land uses.	Consistent. As mentioned above, Project construction would occur within the hours allowed by the City's Municipal Code Section 8.24.050. As discussed in Section 13, <i>Noise</i> , Project construction noise impacts on adjacent noise-sensitive receptors would be less than significant.
Policy N-7.4: Encourage limitations on the hours of operations and deliveries for commercial, mixed-use, and industrial uses abutting residential zones.	Consistent. Project operations are anticipated to be 24 hours a day, seven days a week. However, as described in Section 13, <i>Noise</i> , operational noise impacts on off-site sensitive receptors would be less than significant.
GOAL CR-1.0: Identify and preserve potential and listed historic resources, including buildings, structures, objects, sites, districts, and archaeological resources citywide.	Consistent. As discussed in Section 5, <i>Cultural Resources</i> , a Cultural Resource Assessment was conducted, and no historical resources were found. No impacts to historical resources would occur and impacts to archaeological resources would be less than significant with the Project's incorporation of

Policy	Consistency
	MM CUL-1, which includes provisions for incidental discoveries.
Policy CR-1.6: Promote the preservation of cultural and historical resources controlled by governmental agencies, including those related to City, School District, and other agencies.	Consistent. As discussed in Section 5, <i>Cultural Resources</i> , a Cultural Resource Assessment was conducted, and no historical resources were found. No impacts to historical resources would occur and impacts to archaeological resources would be less than significant with the Project's incorporation of MM CUL-1, which includes provisions for incidental discoveries.
GOAL CR-4.0: Identify and preserve archaeological and cultural resources.	Consistent. A Cultural Resource Assessment was conducted on-site, and no resources were found. As discussed in Section 5, <i>Cultural Resources</i> , in the event that unanticipated resources are discovered during grading activities, the Project incorporates MM CUL-1 to mitigate potential impacts to resources.
Policy CR-4.1: Identify, designate, and protect historically and culturally significant archaeological resources or sites.	
Policy INF-1.6: Require that new developments fund fair-share costs associated with City provision of water, sewer, and storm drain service and are consistent with City and service provider plans to complete needed improvements and funding capacity for such improvements.	Consistent. The Project applicant would be required to pay applicable development impact fees as required by City regulations.
Policy INF-3.6: Require that new developments fund fair-share costs associated with City provision of right-of-way maintenance services and are consistent with City and service provider plans to complete needed improvements and funding capacity for such improvements.	Consistent. The Project applicant would be required to pay applicable development impact fees as required by City regulations.
Policy INF-4.2: Continue to require utilities to be placed underground for new development.	Consistent. The Project would include connections to existing underground utilities. New above ground utilities would not be constructed as part of the Project.
Policy UD-3.3: Strengthen the urban form of the City's commercial, industrial, institutional, and mixed-use districts by working within the character of the existing historical and architectural fabric of the community, while allowing for the addition of complementary new development and urban design elements.	Consistent. As shown in Figure 8, <i>Elevations</i> , the Project would establish an architectural presence through emphasis on building finish materials (stucco, wood slats, and brushed carbon) and would include shades of white, grey, and charcoal to be consistent with surrounding light industrial buildings.
GOAL ED-1.0: Sustain a diversified economic base and strong fiscal stability.	Consistent. The Project would construct an industrial warehouse with related manufacturing uses which would contribute to the City's economy.
Policy ED-1.1: Provide for land uses that allow a variety of retail, service, manufacturing,	Consistent. The Project would construct a mixed industrial warehouse with related manufacturing

Policy	Consistency
institutional, office, and recreational businesses to locate in Orange.	uses and office space within the light industrial designated area.
Policy ED-1.3: Retain industrial land for businesses that provide jobs for manufacturing and processing of goods and create local revenue sources.	Consistent. The Project would redevelop the existing office buildings to construct a warehouse with related manufacturing uses, a permitted use within the light industrial land use designation. Operation of the warehouse facility would generate local income for the City.
Policy ED-1.4: Encourage physical expansion of manufacturing operations and research and development businesses within light industrial and manufacturing areas.	Consistent. The existing office buildings total 191,127 SF. The Project would expand operations through the development of a 298,918 SF industrial warehouse inclusive of related manufacturing uses and ancillary office space.
GOAL ED-3.0: Strengthen the City's economic base and stimulate employment through new commercial and industrial development and expansion.	Consistent. The Project would include redevelopment of the existing office buildings for a larger industrial warehouse with related manufacturing uses and ancillary office space, which would generate an increased revenue.
Policy ED-6.1: Provide and maintain infrastructure adequate to support growth and expansion of commercial, industrial, and institutional areas, including water, sewer, streets, curbs, gutters, sidewalks, storm drains, access, and parking improvements.	Consistent. The Project would install on-site water, sewer, and storm drainage infrastructure to accommodate operation of the Project. Additionally, the Project would require the installation of a 12-inch City distribution line.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

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

Impact Analysis:

a) The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

The Project site is located outside of any California Geological Survey designated Mineral Resource Zones; thus, the project site is not identified as an area that contains known mineral deposits of any value or significance (California Geological Survey (CGS), 1994). The Project site is an urban infill site that is fully paved with asphalt and is surrounded by developed areas. The Project site and vicinity are not currently used for mining activities and have not been historically used for mining activities. Additionally, the City's General Plan EIR determined that no impacts would occur to mineral resources through development of the General Plan (City of Orange, 2010b). Thus, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state, and impacts would not occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

As previously discussed, the General Plan EIR determined that buildout based on the General Plan would not result in impacts to mineral resources within the City. Thus, no impacts related to the loss of availability of a locally important mineral resource recovery site, as delineated on a local general plan, specific plan, or other land use plan, would occur as a result of the Project.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

13. NOISE.

Would the project result in:

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

The discussion below is based on the Noise and Vibration Impact Analysis prepared by LSA in September 2025 (included as Appendix K).

Impact Analysis:

a) The Project would not generate a temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

The Project site is surrounded by residential uses to the north and east and by industrial uses to the south and west. Sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. The City's General Plan Noise Element defines noise-sensitive uses as residences, hospitals, convalescent and day care facilities, schools, and libraries (City of Orange, 2010a). The nearest sensitive receptors are as follows:

- **North:** Existing single-family residences approximately 54 feet away from the Project boundary line.
- **East:** Existing single-family residences approximately 150 feet away from the Project boundary line.

The primary existing noise sources in the Project area include traffic on Glassell Street and Fletcher Avenue, and infrequent rail activity to the east. Three long-term (24-hour) noise measurements were conducted in the vicinity of the Project site. Table NOI-1 provides a summary of the measured hourly noise levels and calculated CNEL level from the long-term noise level measurements. As shown in Table NOI-1, the hourly noise levels at surrounding sensitive uses are as low as 44.1 dBA Leq during nighttime hours and 49.4 dBA Leq during daytime hours. As shown in the table, the calculated CNEL levels range from 56.5 dBA CNEL to 70.7 dBA CNEL.

Table NOI-1: Long-term Ambient Noise Measurements

Location		Daytime Noise Levels ¹ (dBA Leq)	Evening Noise Levels ² (dBA Leq)	Nighttime Noise Levels ³ (dBA Leq)	Daily Noise Levels (dBA CNEL)
LT-1	2411 North Glassell Street, Orange, CA. On tree just north of the fence line along Fletcher Avenue, approximately 40 feet from the Fletcher Avenue centerline and 260 feet from the Glassell Street centerline.	57.7-64.4	56.1-61.6	49.1-59.1	63.2
LT-2	318 East Redwood Ave, Orange, CA. On the tree just west of the sidewalk near the residence, approximately 80 feet from the Fletcher Avenue centerline and 20 feet from the Beechwood Street centerline.	49.4-59.0	50.0-53.4	44.1-50.7	56.5
LT-3	Near the southwest corner of 508 East Glendora Avenue, Orange, CA. On a utility pole, approximately 70 feet from the Orange Olive Road centerline and 135 feet from the rail centerline.	67.1-70.8	63.9-68.6	55.0-66.1	70.7

Notes: Noise measurements were conducted from September 3 to September 4, 2025, starting at 12:00 a.m.

¹ Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 7:00 p.m.

² Evening Noise Levels = noise levels during the hours from 7:00 p.m. to 10:00 p.m.

³ Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.

dBA = A-weighted decibels; Leq = equivalent continuous sound level; CNEL = Community Noise Equivalent Level

Source: Appendix K

Construction

Noise from construction would be regulated by Chapter 8.24, Noise Control, of the City's Municipal Code. Section 8.24.050(E) states that construction noise is exempt from the standards identified in Chapter 8.24 if construction activities occur during the hours of 7:00 a.m. to 8:00 p.m., Monday through Saturday, or during the hours of 9:00 a.m. to 8:00 p.m. on Sundays and federal holidays. Since the City does not have defined daytime construction noise limits, construction noise impacts were assessed using criteria from the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). Table NOI-2 shows the FTA's detailed assessment construction noise criteria based on the composite noise levels per construction phase.

Table NOI-2: Daytime Construction Noise Criteria

Land Use	Daytime 1-hour Leq (dBA)
Residential	80
Commercial	85
Industrial	90

Notes: dBA = A-weighted decibels; Leq = equivalent continuous sound level
Source: Appendix K

Two types of short-term noise impacts could occur during the construction of the analyzed Project. First, construction crew commutes and the transport of construction equipment and materials to the site for the analyzed Project would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance (passing trucks at 50 feet would generate up to 84 dBA Lmax), the effect on longer-term ambient noise levels would be small when compared to the existing average daily traffic volume on Glassell Street. During the building construction phase, approximately 565 acoustically equivalent trips would occur during an average day from worker and delivery activities resulting in a traffic noise increase of approximately 0.1 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear. Therefore, short-term construction-related impacts associated with worker commutes and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction, which includes demolition of the existing structures and other site improvements, site preparation, grading, building construction, paving, and architectural coating on the Project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. A composite noise level was calculated for multiple pieces of construction equipment operating simultaneously during each construction phase. The Project construction composite noise levels at a distance of 50 feet would range from 74 dBA Leq to 88 dBA Leq, with the highest noise levels occurring during the demolition and site preparation phases. Table NOI-3 shows the nearest sensitive uses to the project site, their distance from the center of construction activities, and composite noise levels expected during construction.

Table NOI-3: Construction Noise Levels at Nearest Receptor

Receptor (Location)	Composite Noise Level (dBA Leq) at 50 feet ¹	Distance (feet)	Composite Noise Level (dBA Leq)
Residential Uses (North)	88	315	72
Industrial Uses (South)		350	71
Industrial Uses (West)		670	65
Residential Uses (East)		700	65

Notes: dBA = A-weighted decibels; Leq = equivalent continuous sound level

¹ The composite construction noise level represents the demolition and site preparation phases which are expected to result in the greatest noise level as compared to other phases.

Source: Appendix K

While construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site sensitive residential uses to the north would reach 72 dBA Leq while construction noise levels would approach 71 dBA Leq at the nearest industrial uses to the south during daytime hours. Construction-related noise impacts would remain below the 80 dBA Leq and 90 dBA Leq 1-hour construction noise level criteria for daytime construction noise level criteria as established by the FTA for residential and industrial land uses, respectively. Additionally, the analyzed Project would comply with the construction hours specified in the City's Noise Ordinance, which states that construction activities are allowed between the hours 7:00 a.m. to 8:00 p.m., Monday through Saturday, and during the hours of 9:00 a.m. to 8:00 p.m. on Sundays and federal holidays. Therefore, construction noise impacts would be less than significant.

Operations

Traffic Noise

The analyzed Project would generate traffic-related noise during operations. As a result of the implementation of the analyzed Project, off-site traffic volumes on surrounding roadways have the potential to increase. Project generated trips were obtained from the VMT Screening Memo prepared for the Project (Appendix M). As shown in the Noise and Vibration Impact Analysis (Appendix K), an increase of approximately 0.2 dBA is expected along Glassell Street. A noise level increase of less than 3 dBA would not be perceptible to the human ear. Therefore, Project-related traffic noise would have a less than significant impact on off-site sensitive receptors.

Stationary Noise

The City's General Plan has established standards for non-transportation or stationary noise sources as summarized in Table NOI-4. These standards are designed to protect noise-sensitive land uses adjacent to stationary sources from excessive noise and represent the acceptable exterior noise levels at the sensitive receptor.

Table NOI-4: Maximum Allowable Noise Exposure – Stationary Noise Sources

Noise Level Descriptor	Daytime (7:00 a.m. to 10:00 p.m.) Leq	Nighttime (7:00 a.m. to 10:00 p.m.) Leq
Hourly Equivalent Level (Leq), dBA	55 dBA	45 dBA
Maximum Level (Lmax), dBA	70 dBA	65 dBA

Notes: dBA = A-weighted decibels; Leq = equivalent continuous sound level

Source: Appendix K

Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site heating, ventilation, and air conditioning (HVAC) equipment, and truck deliveries and loading and unloading activities.

HVAC equipment. The Project would have various rooftop mechanical equipment, including HVAC units, on the proposed building. The Project is assumed to have four rooftop HVAC units that are assumed to operate 24 hours per day. The HVAC units would generate sound power levels (Lw) of up to 87 dBA Lw or a sound pressure level of 72 dBA Leq at 5 feet.

Truck Arrival and Departure Activities. Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA Leq at 20 feet. Trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than 5 minutes). It is assumed that truck arrivals and departure activities could occur at 10 spaces for a period of less than 5 minutes each. *Truck Loading and Unloading Activities.* Delivery trucks being loaded and unloaded would generate a noise level of 75 dBA Leq at 20 feet. It is assumed that unloading activities at half of the total docks (3 docks) simultaneously for a period of 30 minutes in a given hour.

Combined Operational Noise. Tables NOI-5 and NOI-6 below show the combined hourly noise levels generated by HVAC equipment and truck delivery activities at the closest off-site land uses. As shown in Tables NOI-5 and NOI-6, operational noise levels would remain below the residential use daytime noise standard of 55 dBA Leq and would not exceed the residential nighttime measured ambient noise levels. Because Project-generated noise levels would not generate a noise level increase of 3 dBA or more over the quietest ambient noise levels for daytime and nighttime, the impacts would be less than significant. Additionally, the 70 dBA Lmax and 65 dBA Lmax noise contours generated by the Project during daytime and nighttime hours, respectively, would remain outside the limits of the closest sensitive receptors. Thus, Project operations would not generate noise levels at surrounding sensitive properties that exceed the noise level standard of 70 dBA Lmax or 65 dBA Lmax. Therefore, stationary-source noise during Project operations would have a less than significant impact on off-site sensitive receptors.

Table NOI-5: Daytime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Daytime Noise Level (dBA Leq)	Project Generated Noise Levels (dBA Leq)	Potential Operational Noise Impact?¹
Residential	North	57.7	35.2	No
Residential	East	67.1	53.6	No

Notes: dBA = A-weighted decibels; Leq = equivalent continuous sound level

¹ A potential operational noise impact would occur if (1) the quietest daytime ambient hour is less than 55 dBA Leq and project noise impacts are greater than 55 dBA Leq, OR (2) the quietest daytime ambient hour is greater than 55 dBA Leq and project noise impacts are 3 dBA greater than the quietest daytime ambient hour.

Source: Appendix K

Table NOI-6: Nighttime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Nighttime Noise Level (dBA Leq)	Project Generated Noise Levels (dBA Leq)	Potential Operational Noise Impact? ¹
Residential	North	49.1	35.2	No
Residential	East	55.0	53.6	No

Notes: dBA = A-weighted decibels; Leq = equivalent continuous sound level

¹ A potential operational noise impact would occur if (1) the quietest nighttime ambient hour is less than 45 dBA Leq and project noise impacts are greater than 45 dBA Leq, OR (2) the quietest nighttime ambient hour is greater than 45 dBA Leq and project noise impacts are 3 dBA greater than the quietest nighttime ambient hour.

Source: Appendix K

Overall, construction and operational noise impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not generate excessive groundborne vibration or groundborne noise levels.

Construction

The Noise and Vibration Impact Analysis prepared for the Project (Appendix K) discusses the level of human annoyance using vibration levels in RMS (VdB) and assesses the potential for building damages using vibration levels in PPV (in/sec). The City has not established vibration thresholds for assessing human annoyance and building damage. Therefore, vibration standards included in the California Department of Transportation's (Caltrans) *Transportation and Construction Vibration Guidance Manual* (Caltrans Manual) were used to determine groundborne vibration impacts on human annoyance and building damage. Table NOI-7 presents the criteria for assessing the potential for interference or annoyance from vibration levels in a building.

Table NOI-7: Construction Vibration Criteria for Human Annoyance

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

Notes: RMS = root mean square; in/sec = inch or inches per second

Source: Appendix K

Table NOI-8 lists the building damage criteria associated with construction vibration. According to the Caltrans Manual and as shown in Table NOI-8, a vibration level of up to 0.5 in/sec in PPV is considered safe

for newer residential structures and modern industrial or commercial buildings and would not result in any construction vibration building damage.

Table NOI-8: Construction Vibration Damage Criteria

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

Notes: PPV = peak particle velocity; in/sec = inch or inches per second

Source: Appendix K

Construction activity can cause varying degrees of ground vibration, depending on the equipment and methods used, the distance to receptors, and soil type. Construction vibrations are intermittent, localized intrusions. The use of heavy construction equipment, particularly large bulldozers, and large loaded trucks hauling materials to or from the site generate construction-period vibration impacts.

Table NOI-9 shows the PPV and RMS values at 25 feet from the construction vibration source. As shown in Table NOI-9, bulldozers and other heavy-duty construction equipment anticipated to be used for this Project would generate up to approximately 0.089 PPV in/sec or 0.062 RMS in/sec of groundborne vibration when measured at 25 feet.

Table NOI-9: Vibration Source Amplitudes for Construction Equipment

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

Notes: PPV = peak particle velocity; RMS = root mean square; in/sec = inch or inches per second; Lv = velocity in decibels

¹ RMS vibration velocity is 70 percent of maximum PPV.

² Equipment expected to be used on site.

Source: Appendix K

Table NOI-10 shows the construction vibration annoyance levels at the nearest receptors. Table NOI-11 shows the construction vibration damage levels at the nearest receptors.

Table NOI-10: Construction Vibration Annoyance Levels at Nearest Receptor

Receptor (Location)	Reference Vibration Level (RMS in/sec) at 25 feet ¹	Distance (feet) ²	Vibration Level (RMS in/sec)
Residential Uses (North)	0.062	315	0.001
Industrial Uses (South)		350	0.001
Industrial Uses (West)		670	<0.001
Residential Uses (East)		700	<0.001

Notes: RMS = root mean square; in/sec = inch or inches per second

¹ The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.

² The assessment distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.

Source: Appendix K

Table NOI-11: Construction Vibration Damage Levels at Nearest Receptor

Receptor (Location)	Reference Vibration Level (PPV) at 25 feet ¹	Distance (feet) ²	Vibration Level (PPV)
Residential Uses (North)	0.089	56	0.028
Industrial Uses (South)		75	0.017
Industrial Uses (West)		150	0.006
Residential Uses (East)		150	0.006

Notes: PPV = peak particle velocity

¹ The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.

² The assessment distance is associated with the peak condition, identified by the distance from the perimeter of construction activities and incorporating the project design features to surrounding structures.

Source: Appendix K

As shown in Table NOI-10, vibration levels are expected to approach 0.001 in/sec RMS at the closest receptors and would not exceed the annoyance thresholds presented in Table NOI-7. As shown in Table in Table NOI-11, vibration levels are expected to approach 0.028 PPV in/sec at the nearest surrounding structures and would remain below the threshold of 0.5 in/sec PPV for building damage presented in Table NOI-8. Vibration levels associated with smaller equipment would be substantially lower than the heavy equipment analyzed. Therefore, construction would not result in any vibration annoyance or damage. Additionally, construction

activities are regulated by the City's Municipal Code, which states that construction activities are allowed between the hours of 7:00 a.m. to 8:00 p.m., Monday through Saturday, and during the hours of 9:00 a.m. to 8:00 p.m. on Sundays and federal holidays, vibration impacts would not occur during the more sensitive nighttime hours. Therefore, construction vibration impacts would be less than significant.

Operation

The analyzed Project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from Project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.076 in/sec PPV, structures greater than 20 feet from the roadways that contain Project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from Project-related traffic on the adjacent roadways would be less than significant.

Overall, construction and operational vibration impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) The Project site is neither located within an airport land use plan, nor within two miles of a public airport. The nearest airport to the Project is John Wayne Airport (JWA), a commercial airport approximately 10 miles to the south. The Project site is well outside the JWA Airport the 60–65 dBA CNEL noise contour (Appendix K). Therefore, the Project would not expose people working in the Project area to excessive airport-related noise levels. Thus, no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

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

Impact Analysis:

a) The Project would not involve the construction of any homes, businesses, or other uses that would result in direct population growth.

The Project site has a General Plan land use designation of Light Industrial (LI), which allows a maximum FAR of 1.0. The analyzed Project would result in an FAR of 0.57, which is consistent with the LI land use designation and maximum FAR. Accordingly, the Project would not result in growth that was not already anticipated by the City of Orange General Plan and General Plan EIR.

The Project could result in indirect population growth to staff the proposed industrial warehouse and manufacturing facility. The Orange Municipal Code Section 10.83.040 uses an employee generation factor of 1 employee for every 525 SF of industrial space. Since the Project would build and operate a 298,918 SF industrial building, operation of the Project would require approximately 570 employees. However, the existing site contains three office buildings that total 191,127 SF. The Orange Municipal Code Section 10.83.040 uses an employee generation factor of 1 employee for every 250 SF of office space. Since the site contains 191,127 SF of office space, the estimated total for existing employees is 765. Therefore, the Project would result in a net decrease of 195 employees. Additionally, the analyzed Project is in an urbanized area of the City that is already served by existing roadways and infrastructure systems. Infrastructure improvements that are capacity-inducing, such as construction of new roadways, addition of a school, or development of a water treatment plant, are not proposed by the Project and are limited to those required to operate the analyzed Project. Therefore, the Project would not induce substantial indirect population growth in the area, and impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The site is currently developed with three office buildings. No housing exists on the Project site. The site is currently zoned for industrial use and development of the site would not reduce housing capacity within the

City. Construction of the Project would not require the removal or displacement of housing, and therefore, would not require construction of replacement housing elsewhere. Thus, no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

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

Impact Analysis:

a) i) The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

The Orange City Fire Department (OCFD) provides fire protection, emergency medical, urban search and rescue, water rescue, and hazardous materials response services in the City. The OCFD is staffed with 115 sworn personnel and 25 non-sworn personnel (City of Orange, 2024). In 2024, the OCFD responded to a total of 18,319 service calls, both within and outside the OCFD's jurisdiction, with an average response time of 5 minutes and 28 seconds (OCFD, 2024). The Fire Chief and management staff of the City of Orange monitor service need to evaluate adequacy of service and annual budget changes. Staffing ratios and response times are not used to determine service adequacy (City of Orange, 2010b). The OCFD operates eight fire stations across the City. The closest fire station to the Project site is Station No. 3, located at 1910 N. Shaffer Street, which is located approximately 1 mile southeast of the Project site.

Implementation of the analyzed Project would be required to adhere to the California Fire Code, as included in the City's Municipal Code Chapter 15.32 and ensured through the City's permitting process. Operation of the proposed manufacturing and warehousing facility would result in an increase in demand for fire protection and emergency medical services. Because fire protection services are currently provided to Project site and Project vicinity by the OCFD and given the Project site's close proximity to an existing fire station, the City's existing fire protection facilities would adequately serve the Project. Thus, the increase in fire service demands from the Project would not require construction of a new or physically altered fire station that could cause environmental impacts. Additionally, the analyzed Project would be required to pay a fire protection facilities fee pursuant to the City's Municipal Code Chapter 15.38, *Fire Protection Facilities Program*. The fire protection facilities fees collected would ensure the level of fire protection services in the City, particularly around the Project site, are maintained and can be applied to the purchase of equipment,

maintenance of existing facilities, and the construction of facilities as needed. Therefore, the Project would result in less-than-significant impacts related to fire services.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

(a) ii) The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

The Orange Police Department (OPD) provides police protection services to the City, including the Project site. The OPD is staffed with 170 sworn full-time personnel and 78 non-sworn full-time personnel (City of Orange, 2024). The OPD headquarters and main police station are located at 1107 N. Batavia Street, approximately 2.3 miles southwest of the Project site. In 2024, the average emergency response time was 4 minutes (OPD, 2024). The OPD does not use officer-to-population ratio or standard response time metrics to evaluate service adequacy (City of Orange, 2010b). Factors used to evaluate police service needs include demographics, services calls, crime trends, and population.

The analyzed Project would redevelop the existing site with a new industrial building with manufacturing and warehousing uses. Crime and safety issues during Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. During operation, the Project is anticipated to generate a typical range of police service calls, such as theft, disturbances, and vandalism. To ensure adequate services are provided and to minimize the demands on police services, security and design measures which employ defensible space concepts would be utilized throughout the formation of development and construction plans. These measures would incorporate the concepts of Crime Prevention through Environmental Design (CPTED), which involves the placement, and orientation of structures, access and visibility of common areas, placement of doors, windows, addressing, lighting and landscaping. CPTED promotes public safety, physical security and allows citizens the ability to monitor activity. In addition, the Project would be required to comply with the requirements established in Chapter 15.52, *Building Security Standards*, of the Orange Municipal Code. Conditions related to CPTED and the Orange Building Security Standards would be included as part of the Project.

Additionally, security concerns would be addressed by the installation of an 8-foot-tall screen wall and two 8-foot-tall steel sliding gates on the eastern and western boundaries of the truck court. An 8-foot-tall tube steel fence would be located along the western boundary of the site and along the remaining southern boundary of the site to the east and west of the screen wall. The Project would also include security lighting along the proposed building. Furthermore, the analyzed Project would be required to pay a police facility development fee pursuant to the City's Municipal Code Chapter 3.13, *Police Facility Development Fee*. The police facility development fee collected would ensure the level of police protection services in the City, particularly around the Project site, are maintained and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of facilities as needed.

Therefore, the Project would not result in a substantial adverse change to existing demand for police services, and the Project would not result in the need for new or expanded police facilities. Impacts related to police services would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

(a) iii) The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services.

The Project consists of an industrial warehousing and manufacturing building, which would not generate new students. As described previously in Section 14, *Population and Housing*, the analyzed Project is anticipated to be employed by residents within the region and the substantial in-migration of employees that could generate new students is not anticipated to occur. Therefore, the Project would not result in the need for new or expanded school facilities, and impacts related to school services would not occur.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities would be addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a State school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. The Project would be required to contribute fees to the Orange Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

(a) iv) The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks services.

As described previously, the analyzed Project consists of an industrial building with manufacturing and warehousing uses. The Project would neither construct any residential facilities, nor create an additional need for housing. As discussed in Section 14, *Population and Housing*, the Project would not result in an increase in the residential population within the City. Therefore, the Project would not generate an increase in the use of the existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project does not propose the construction or expansion of recreational facilities or parks which could negatively impact the environment. In addition, no off-site parks or recreational improvements are proposed or required as part of the Project. Thus, no impacts related to park facilities would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

(a) v) The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.

As described previously, the proposed industrial facility would not result in an increase in population or a substantial in-migration of employees during construction or operation. An increased need for other public services (such as public libraries, medical facilities, and post offices, etc.) as a consequence of Project buildout is not anticipated to occur. Therefore, the Project would not result in the need for new or physically altered facilities to provide other services. Thus, no impacts related to other public services would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

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

Impact Analysis:

a) The Project would not 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.

The City of Orange maintains the local parks and provides recreational services for the Project area. The closest park to the Project site is Shaffer Park, approximately 0.5 roadway miles south of the Project site. The Project is an industrial warehousing and manufacturing facility and would not generate any residential population that would require the use of parks or recreational facilities. As previously discussed, the employees needed to operate the analyzed Project are anticipated to come from the unemployed labor force in the surrounding area. As a result, the Project would not result in substantial unplanned population growth. Therefore, the Project would not increase the use of existing recreational facilities such that physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

As previously discussed, the Project consists of an industrial warehousing and manufacturing facility that would not increase the residential population within the City. Additionally, the employees needed to operate the Project are anticipated to come from the unemployed labor force in the region. Therefore, the Project would not generate additional need for parkland such that the construction or expansion of recreational facilities would be required. Additionally, the Project does not propose the construction or expansion of recreational facilities or parks. Thus, Project impacts related to construction of new or expanded recreational facilities would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

17. TRANSPORTATION.

Would the project:

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

The discussion below is based on the Traffic Impact Analysis prepared by EPD Solutions, Inc. in March 2026 (included as Appendix L) and the VMT Screening Memo prepared by EPD Solutions, Inc. in December 2025 (included as Appendix M).

Impact Analysis:

a) The Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Construction

Construction activities associated with the Project would generate vehicular trips from construction workers traveling to and from the Project site, delivery of construction supplies and import of materials to, and export of debris from, the Project site. However, these construction activities would be temporary in nature and only occur during the anticipated 17-month construction period. The increase in trips during construction activities would be limited and is not anticipated to exceed the number of operational trips described below. The short-term vehicle trips from construction of the Project would generate less-than-significant traffic related impacts.

Operation

Transit Facilities

The Orange County Transportation Authority (OCTA) provides bus services in the Project vicinity. OCTA Route 59 has bus stops in the vicinity of the Project site at the Glassell Street and Fletcher Avenue intersection and the Glassell Street and Lincoln Avenue intersection (Appendix L). The Project would not alter or conflict with existing transit stops and schedules. Therefore, impacts related to transit facilities would be less than significant.

Bicycle Facilities

Currently, there are no Class II (striped) or Class IV (separated) bike lanes along North Glassell Street in the immediate vicinity of the site (Appendix L). The Project does not include any changes to the existing bicycle facilities. Therefore, impacts related to bicycle facilities would be less than significant.

Pedestrian Facilities

Sidewalks are present on both sides of Glassell Street (Appendix L). The Project would maintain the existing 7.9-foot-wide sidewalk along Glassell Street and the existing curb and gutter along Fletcher Avenue. Thus, the Project would improve pedestrian access in the Project vicinity. Therefore, impacts related to pedestrian facilities would be less than significant.

Roadway Facilities

As presented in Table T-1 below, the analyzed Project is estimated to generate 843 daily trips, with 108 trips during the AM peak hour and 116 trips during the PM peak hour. Considering trips generated by the existing uses on the site, the Project is expected to result in 1,229 fewer daily trips, 184 fewer trips during the AM peak hour, and 160 fewer trips during the PM peak hour. As described previously, access to the Project site would be provided via two proposed driveways from Glassell Street on the western boundary of the site. The northern driveway on Glassell Street would be 30-foot-wide and would be limited to passenger vehicle access. The southern driveway on Glassell Street would be 49-feet wide and allow both truck and passenger vehicle access. Both driveways would provide ingress and egress to the Project site. Further, internal circulation would be via a 28-foot-wide driving aisle, which doubles as the fire lane. Additionally, as described in Table LU-1 above, the Project would be consistent with applicable circulation policies from the City's General Plan Circulation Element. Therefore, impacts related to roadway facilities would be less than significant.

Significance Determination: Less than significant impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant impact.

b) The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

The analyzed Project trip generation was calculated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition* (2021). The existing office buildings were analyzed using the land use code for General Office Building (ITE Land Use Code 710). The analyzed Project was analyzed using the land use codes for Manufacturing (ITE Land Use Code 140) and Warehouse (ITE Land Use Code 150). The vehicle splits from the South Coast Air Quality Management District (SCAQMD) Warehouse Truck Trip Study and the passenger vehicle/truck split from the ITE rates were applied to both warehouse and manufacturing uses (without cold storage).

Table T-1 presents the trip generation estimates for the existing use and the analyzed Project. The existing site generates 2,072 daily trips, including 291 trips during the AM peak hour and 275 trips during the PM peak hour. The analyzed Project is estimated to generate 843 daily trips, with 108 trips during the AM peak hour and 116 trips during the PM peak hour. Overall, the Project is expected to result in 1,229 fewer daily trips, 184 fewer trips during the AM peak hour, and 160 fewer trips during the PM peak hour.

Table T-1: Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
<u>Trip Rates</u>									
710 General Office Building ¹	TSF	10.84	1.34	0.18	1.52	0.24	1.20	1.44	
150 Warehousing ²	TSF	1.71	0.13	0.04	0.17	0.05	0.13	0.18	
140 Manufacturing ³	TSF	4.75	0.52	0.16	0.68	0.23	0.51	0.74	
<u>Existing Site Trip Generation</u>									
Existing Office Buildings ¹	191.127	TSF	2,072	256	35	291	47	228	275
<u>Proposed Project Trip Generation</u>									
Proposed Warehouse ²	189.188	TSF	324	25	7	32	10	25	34
<u>Vehicle Mix⁴</u>		<u>Percent</u>							
Passenger Vehicles	64.91%	210	17	5	21	6	17	23	
2-Axle Trucks	5.87%	19	1	0	2	1	1	2	
3-Axle Trucks	7.27%	24	2	1	2	1	1	2	
4+-Axle Trucks	21.95%	72	5	2	7	2	5	7	
Total Trip Generation	100.0%	325	25	7	33	10	24	34	
Proposed Site Trip Generation									
Proposed Manufacturing ³	109.000	TSF	518	56	18	74	25	56	81
<u>Vehicle Mix⁵</u>		<u>Percent</u>							
Passenger Vehicles	90.53%	469	51	16	67	23	51	73	
2-Axle Trucks	1.58%	8	1	0	1	0	1	1	
3-Axle Trucks	1.96%	10	1	0	1	0	1	2	
4+-Axle Trucks	5.93%	31	4	2	6	2	4	6	
Total Trip Generation	100.0%	518	56	19	75	25	57	82	
<u>Total Proposed Project Passenger Vehicle Trips</u>									
		680	68	20	88	29	68	96	
<u>Total Proposed Project Trip Generation</u>									
		843	81	26	108	35	81	116	
<u>Net Passenger Vehicle Trips</u>									
		-1,392	-188	-15	-203	-18	-161	-178	
<u>Net Project Trip Generation</u>									
		-1,229	-175	-9	-184	-12	-147	-160	

TSF = Thousand Square Feet

PCE = Passenger Car Equivalent

¹ Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual, 11th Edition, 2021*. Land Use Code 710-General Office Building

² Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual, 11th Edition, 2021*. Land Use Code 150 - Warehousing.

³ Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual, 11th Edition, 2021*. Land Use Code 140 - Manufacturing.

⁴ Passenger car/truck splits are derived from ITE Land Use Code 150 - Warehousing. Truck Mix from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. Without Cold Storage.

⁵ Passenger car/truck splits are derived from ITE Land Use Code 140 - Manufacturing. Truck Mix from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. Without Cold Storage.

* The table might contain minor rounding errors due to multiple rates and or percentages being applied. Priority was placed on the total trips. The minor rounding errors would not impact the overall analysis.

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. SB743 specified that the new criteria should promote the reduction of GHGs, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019, with the provisions of the section applying statewide beginning on July 1, 2020. State CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, states that VMT is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

The City of Orange *Traffic Impact Analysis Guidelines for VMT and Level of Service Assessment* (TIA Guidelines) identify screening thresholds to determine if projects would require a full VMT analysis. If a project meets one of the following criteria, then the VMT impact of the project is considered less-than significant and no further analysis of VMT would be required:

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

The applicability of each criterion to the Project is discussed below.

Screening Criterion 1 – Transit Priority Area Screening

According to the City's TIA Guidelines, projects located within a Transit Priority Area (TPA) may be presumed to have a less-than-significant impact. A TPA is defined as a half-mile radius around an existing major transit stop or an existing stop along a high-quality transit corridor. However, projects may not meet the screening threshold if the following criteria are not satisfied:

- The floor area ratio (FAR) is below 0.75.
- The project includes more parking than required by the jurisdiction.
- The project is inconsistent with the applicable Sustainable Communities Strategy.
- The project replaces affordable residential units with a smaller number of moderate- or high-income residential units.

As indicated in Figure 3 of the VMT Screening Memo, the Project site is not located within a designated TPA. Given that the Project is not within a TPA, it does not satisfy Screening Criterion 1.

Screening Criterion 2 – Low VMT Area Screening

The City of Orange TIA Guidelines utilize the Orange County Traffic Analysis Model (OCTAM) travel demand forecasting tool to identify low VMT-generating areas for screening purposes. Under these guidelines, projects located within areas that generate VMT below the City average may be presumed to have a less-than-significant VMT impact and may be screened from detailed VMT analysis.

As shown in Figure 4 of the VMT Screening Memo, the Project site is located within an area with VMT higher than the City of Orange average. Therefore, the Project does not meet Screening Criterion 2 for low VMT areas.

Screening Criterion 3 – Project Type Screening

According to the City's TIA Guidelines, projects proposing local-serving uses, such as community-oriented facilities, are generally presumed to have a less than significant impact on VMT. Local-serving uses include K-12 schools, daycare centers, local parks, student housing, and community institutions like libraries and fire stations. Additionally, projects generating fewer than 110 average daily vehicle trips are typically not expected to substantially increase citywide or regional VMT.

In light of the recent Court of Appeal ruling in *Cleveland Nat. Forest Foundation v. County of San Diego*, the 110 daily trips is no longer a screen-out criteria within the City of Orange, despite its inclusion in the guidelines. Based on the Cleveland National Forest ruling, each lead agency must define a small project, based on local context and fact-based substantial evidence, for the purpose of identifying significant VMT impacts. Accordingly, the City has elected to rely on OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which states that "Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact."

Based on the foregoing guidance, the VMT Screening Memo (Appendix M) evaluated the net overall change in VMT for the analyzed Project using the Orange County Transportation Analysis Model (OCTAM). OCTAM was run for the Base Year (2019) and Cumulative Year (2050) under No Project and Plus Project conditions (i.e., four full model runs). The total Origin-Destination (OD) VMT of the Project Transportation Analysis Zone (TAZ) was evaluated using the OCTAM VMT post-processor from the OCTAM Base Year (2019) and Cumulative Year (2050) Plus Project model runs. The Baseline 2025 VMT of the Project TAZ was interpolated using linear interpolation between the 2019 and 2050 model outputs.

Table T-2 presents the VMT evaluation results for the Project using OCTAM. As shown in Table T-2, the analyzed Project's VMT would be 25,927 less under the Baseline (2025) Plus Project scenario and 25,093 less under the Cumulative (2050) Plus Project scenario, compared to the No Project scenario. Thus, based on substantial evidence, the total VMT is less under the Plus Project scenario compared to the No Project scenario. Therefore, the Project qualifies for screening under Criteria 3 and would result in a less than significant VMT impact.

Table T-2: VMT Evaluation for Analyzed Project

	Base Year 2019 VMT	Baseline 2025 VMT	Cumulative Year 20250 VMT
Existing Use	37,738	37,626	37,159
Analyzed Project	11,611	11,699	12,066
Net VMT	-26,127	-25,927	-25,093

Source: Appendix M

Significance Determination: Less than significant impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant impact.

c) The Project would not substantially increase hazards due to a geometric design feature incompatible uses.

Access to the analyzed Project would be provided via two proposed driveways from Glassell Street on the western boundary of the site (as shown in Figure 7, *Conceptual Site Plan*). The northern driveway on Glassell Street would be 30 feet wide and would be limited to passenger vehicle access. The southern driveway on Glassell Street would be 49 feet wide and allow both truck and passenger vehicle access. Both driveways would provide ingress and egress to the Project site. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site area. The Project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. The analyzed Project includes a 28-foot-wide internal driving aisle that would double as a fire lane. Fire department access would be provided via a 28-foot-wide driveway on Fletcher Avenue in the northeast corner of the site. The design of the Project, including the internal roadway and driveways, is subject to the City's development standards and would be reviewed to ensure compliance with applicable building and fire codes. As a result, the Project's impacts related to vehicular circulation design features would be less than significant.

Significance Determination: Less than significant impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant impact.

d) The Project would not result in inadequate emergency access.

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access for emergency vehicles to the Project site or adjacent areas. During construction of the Project driveways along Glassell Street and Fletcher Avenue, and the construction of water and sewer line connections to existing lines in Fletcher Avenue and Glassell Street, the adjacent roadways would remain open to ensure adequate emergency access to the Project site and its vicinity, and impacts related to inadequate emergency access during construction activities would not occur.

As described previously, access to the analyzed Project would be provided via two proposed driveways from Glassell Street on the western boundary of the site. The analyzed Project includes a 28-foot-wide internal driving aisle, which doubles as the fire lane. Fire department access would be provided via a 28-foot-wide driveway on Fletcher Avenue in the northeast corner of the site. The driveway on Fletcher Avenue would be constructed pursuant to existing California Fire Code regulations, as verified through the City's permitting process. Thus, impacts related to inadequate emergency access would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

18. TRIBAL CULTURAL RESOURCES.

<p><i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:</i></p>		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	☐	☐	☐	☒
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☒	☐	☐

The discussion below incorporates information from the Cultural Resources Study prepared by BFS&A Environmental Services in February 2025 (included as Appendix E).

Assembly Bill 52

The Project is subject to Assembly Bill (AB) 52 regarding tribal consultation. AB 52 requires that Lead Agencies evaluate a project's potential to impact tribal cultural resources. Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

To identify if any tribal cultural resources are potentially located within the Project site, a Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on January 28, 2025. The NAHC responded on February 4, 2025, stating that the SLF search yielded negative results for known tribal cultural resources or sacred lands within a 1-mile radius of the Project area. The NAHC provided the contact information for 22 Native American tribes and individuals to be contacted for further information regarding the Project area and vicinity.

AB 52 was initiated on July 2, 2025, and concluded August 1, 2025. AB 52 notices regarding this Project were mailed to all Native American tribes identified by the NAHC. Two tribes responded during the AB 52 consultation period.

The Gabrieleño Band of Mission Indians – Kizh Nation responded in an email dated July 7, 2025, requesting AB 52 consultation. However, in an email dated July 16, 2025, the tribe stated that they would forgo consultation if the City accepted mitigation measures requested by the tribe and provided the proposed mitigation measures. The City accepted and agreed to the proposed mitigation measures. Consultation with the Gabrieleño Band of Mission Indians – Kizh Nation concluded on October 3, 2025.

The Pala Band of Mission Indians responded in an email dated July 11, 2025, declining further consultation.

Impact Analysis:

a) The Project site consists of two fully disturbed parcels, which encompass 12.1 net acres. The site is fully developed with three office buildings and paved parking. Based on a records search of the South Central Coastal Information Center (SCCIC) and a field survey, the Project site does not contain any known historic resources (Appendix E). In addition, a Sacred Lands File search from the Native American Heritage Commission indicated negative results for the presence of sacred sites. Additionally, the Project site does not contain any historic resources listed as part of a local register. Therefore, the Project would not be anticipated to result in impacts to historic resources that are listed or eligible for listing.

However, the Project would require ground disturbing activity in an area identified as sensitive by a consulting tribe. During ground disturbing activities, a tribal cultural resource could be inadvertently discovered and damaged if not properly protected. Therefore, Mitigation Measure TCR-1 through TCR-3 have been included to address the potential impacts to tribal cultural resources. Mitigation Measure TCR-1 requires onsite monitoring by a Native American monitor from the Gabrieleño Band of Mission Indians – Kizh Nation or approved representative. Mitigation Measure TCR-2 requires that upon discovery of a TCR, all construction activities in the immediate vicinity would cease until proper assessment and recovery of the resource has been completed. Mitigation Measure TCR-3 requires that upon discovery of Native American human remains, the procedures outlined in Public Resource Code 5097.9 and California Health and Safety Code Section 7050.5 shall be carried out. Therefore, implementation of Mitigation Measures TCR-1 through TCR-3 would reduce potential impacts to tribal cultural resources to a less-than-significant level.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) As described previously in Section 5, *Cultural Resources*, no archaeological resources were identified within the Project site as part of the records search with SCCIC (Appendix E). However, due to the Project site's location in an area where Native American tribes are known to have a cultural affiliation, there is the possibility that archaeological resources, including tribal cultural resources, could be encountered during ground disturbing construction activities. During the AB 52 consultation process, the Gabrieleño Band of Mission Indians – Kizh Nation expressed concerns that construction activities at the Project site have the potential to impact tribal cultural resources that may be present in subsurface soil layers.

As described previously and included as PPP CUL-1, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, implementation of Mitigation Measures TCR-1 through TCR-3 would reduce potential impacts to tribal cultural resources to a less-than-significant level.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:

MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Significance Determination After Mitigation: Less than significant.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. Listed previously in Section 5, *Cultural Resources*.

19. UTILITIES/SERVICE SYSTEMS.

Would the project:

	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
(e) Comply with federal, State, and local management and reduction statutes and regulations related to solid wastes?	☐	☐	☐	☒

Impact Analysis:

a) The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

The Project would include construction of an industrial building that involves the modification and operation of water, stormwater drainage, and electrical infrastructure as described below. Additionally, the Project would require the installation of approximately 1,200 linear feet of a 12-inch City distribution water line and three public fire hydrants in Fletcher Avenue.

Water

The City's Water Division of the Public Works Department supplies potable water for residents and businesses, including buildings currently operating on the Project site.

The Project would remove the existing water connection that transects the site from Fletcher Avenue and curves through to the southwest corner of the Project site towards Glassell Street and remove one existing fire hydrant along Fletcher Avenue. Additionally, the Project would cut, cap, and protect in place the 8-inch water mains at the water valves in Fletcher Avenue and Glassell Street. A new water connection would be constructed from Glassell Street to the proposed industrial facility north of the existing connection.

Additionally, irrigation service would connect parallel to and just south of proposed domestic water connection into the Glassell Street water main.

The on-site water system would convey water supplies to the proposed industrial building and landscaping through plumbing and landscaping fixtures that would be compliant with the CALGreen Code for efficient use of water.

Additionally, approximately 1,200 linear feet of a 12-inch City distribution water line and three public fire hydrants in Fletcher Avenue would be installed as part of the Project. Although the improvements would include extension of public water infrastructure, the existing area is completely built out and reliance on the proposed water main is not required for surrounding infrastructure and development. Residential uses across Fletcher Avenue could connect to the portion of distribution line in the future; however, the infrastructure would not facilitate future development since utilities are preexisting in the Project area. Additionally, proposed improvements have been captured as part of the Project throughout this analysis, including potential air quality, greenhouse gas, and noise impacts in their respective environmental topic sections. Installation of the new water infrastructure would only serve the Project and would not provide new water supplies to any off-site areas. Impacts would be less than significant.

Wastewater

The Orange County Sanitation District (OCSD) treats wastewater from the City, including sewage from buildings currently operating on the Project site. Local sewer lines are owned and maintained by the City while the District owns, operates, and maintains the large trunk sewers of the regional wastewater conveyance system. The Project proposes connection to the existing 12-inch sanitary sewer main in Glassell Street via a proposed 6-inch sewer line south of the proposed water lines. Additionally, the Project may also tie-in to the existing sewer line that connects to Fletcher Avenue. The existing sewer lines would accommodate development of the Project site and would not require expansion to serve the Project. Impacts would be less than significant.

Stormwater

The Project would remove existing storm drains and catch basins and install a new underground stormwater infiltration system in the southwest corner of the site to collect, treat, and infiltrate stormwater. Stormwater would be collected via a new series of catch basins, inlets, and storm drain lines. The DCV would be infiltrated. Overflow would discharge from the underground infiltration system and would be routed to the 30-inch storm drain line that is on-site and continues down Glassell Street.

To match the hydrologic characteristics of the existing site, the required design capture volume of the site would be 30,995 cubic feet, and the proposed infiltration chamber would provide a capacity of 32,083 cubic feet (Appendix J). Therefore, the Project would meet stormwater treatment specifications per the NPDES permit, which requires treatment capacity for a 2-year, 24-hour storm event (Appendix J). The Project would not require or result in the construction of new off-site storm water drainage facilities or expansion of existing off-site facilities and impacts would be less than significant.

Electric Power

The analyzed Project includes the design and installation of a new 4,000 amp electrical service to support the industrial building's power distribution needs. A dedicated electrical room will be constructed to safely house all primary electrical equipment, including switchgear, transformers, and distribution panels. The Project

would connect to the existing infrastructure and would not require the construction of new electrical distribution facilities. Impacts would be less than significant.

Natural Gas

The Project would not connect to existing facilities nor require the use of natural gas.

Telecommunications

The Project would connect to existing telecommunication facilities via cable within Glassell Street near the main entrance of the Project site.

Conclusion

The potential impacts of the development of the Project's utility infrastructure are considered as part of the impacts of the Project as a whole and are analyzed throughout the various sections of this IS/MND. For example, activities such as excavation and equipment installation as required for the new self-storage facility are analyzed in the Air Quality, Greenhouse Gas Emissions, and Noise sections of this IS/MND. As discussed throughout this IS/MND, installation of on-site utility infrastructure would not result in an adverse physical effect on the environment with incorporation of identified mitigation measures into the Project. Further, the Project site currently operates as office use, and the analyzed Project would replace existing demand of services. Thus, the Project's potential impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

b) The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

The City receives imported water from the Municipal Water District of Orange County, from local groundwater from the Orange County Groundwater Basin, and from local surface water from the Serrano Water District. The Project site contains three existing office buildings. The Project site is developed with 191,127 SF of commercial office use. The Orange Municipal Code Section 10.83.040 uses an employee generation factor of 1 employee for every 250 SF of office space, which would be equivalent to approximately 765 existing employees. The General Plan EIR uses a water demand factor of 0.24 acre-feet per person per year. Based on this factor, the existing use is estimated to require approximately 183.6 acre-feet per year.

The Project would be anticipated to employ approximately 570 employees during Project operation. Based on this factor, the Project would result in a water demand of approximately 136.8 acre-feet per year. The Project would result in a net demand reduced of 46.8 acre-feet per year.

The City prepared the 2020 Urban Water Management Plan (UWMP) in order to assess long-term water supply sources, demands, reliability, and conservation strategies. Table UT-1, *City of Orange Water Supply Projections (acre-feet)*, shows the water supply characterization for the City, taking into account increased supply as a result of passive water savings from conservation requirements.

Water use projections are based on expected land use development. Table UT-2 shows the City of Orange water use projections through 2045. The Project buildout is consistent with the Project site's existing Light Industrial land use designation and M-2 zoning; thus, water usage of the Project has been accounted for within the 2020 UWMP.

Table UT-1: City of Orange Water Supply Projections (acre-feet)

Source	2025	2030	2035	2040	2045
OC Groundwater Basin	23,148	23,913	23,928	23,910	23,865
Imported/Purchased	2,885	3,020	3,023	3,019	3,012
Surface water	1,200	1,200	1,200	1,200	1,200
Total	27,233	28,133	28,151	28,130	28,077

Source: Orange 2020 UWMP.

Table UT-2: City of Orange Water Use Projections (Potable and Non-Potable) (acre-feet)

Source	2025	2030	2035	2040	2045
Potable Water, Raw, Other Non-potable	27,233	28,133	28,151	28,130	28,077
Recycled Water	0	0	0	0	0
Total	27,233	28,133	28,151	28,130	28,077
Projected Supply	27,233	28,133	28,151	28,130	28,077
Difference	0	0	0	0	0

Source: Orange 2020 UWMP

The UWMP indicates that the City of Orange has sufficient water supply to provide for anticipated water demand. Thus, the Project is not anticipated to generate a substantial increase in demand for potable water. The Water Service Reliability and Drought Risk Assessment section of the UWMP concludes that supply and demand are forecasted to be balanced through 2045, under normal years, single-dry years, and multiple-dry year scenarios. Therefore, the Project's potential impacts related to water supplies would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) The Project would 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.

The City receives wastewater treatment service from the Orange County Sanitation District (OCSD). Two wastewater treatment plants handle wastewater flow from the City of Orange: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. The two facilities have a combined design capacity of 332 million gallons per day (mgd) (United States Environmental Protection Agency, 2021). The

facilities treat an average daily wastewater flow of 189 mgd, leaving a remaining capacity of 143 mgd (Orange County Sanitation District, 2021).

The General Plan EIR uses a wastewater generation rate of 104 gallons per person per day. Based on this factor, and an estimated employee count of 570, the Project would generate approximately 59,280 gallons per day (gpd) of wastewater or 0.059 mgd per day. The existing use is estimated to have 765 employees as described above, and further, is estimated to have an existing generation of 79,560 gpd. Therefore, the Project's wastewater generation would be reduced from existing conditions and within the current capacity for the OCSD and no new or expanded off-site facilities are required. The Project's potential impacts related to wastewater generation would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

d) The Project would not 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.

The landfills that serve the City of Orange include Prima Deshecha Landfill in San Juan Capistrano, the Olinda Alpha Sanitary Landfill in Brea, and the Frank R. Bowerman Landfill in Irvine. The Orange County Integrated Waste Management Department owns and operates these landfills. Information regarding these landfills is detailed on Table UT-3, *Landfill Capacity*, below. Based on the average daily disposal calculated from the 2024 annual disposal tonnage, the landfills have a combined total daily disposal availability of 10,159 tons per day (tpd).

Table UT-3: Landfill Capacity

Name	Max Daily Permitted (tpd)	Average Daily Tonnage (tpd) ¹	Available Daily Disposal (tpd)	Closure Date
Prima Deshecha Landfill	4,000	2,093	1,907	12/31/2102
Olinda Alpha Sanitary Landfill	8,000	4,657	3,343	12/31/2036
Frank R. Bowerman Landfill	11,500	6,591	4,909	12/31/2053
Total		13,341	10,159	

Source: (CalRecycle, 2024)

Construction

The Project would generate solid waste from construction and demolition debris during the short-term construction period. The demolition phase of construction involves removal of asphalt and the existing buildings. Based on the existing buildings and the average thickness and mass of hardscape, demolition would result in approximately 2,600 tons of debris. Solid waste would be disposed of in accordance with local solid waste disposal requirements. Additionally, Section 5.408.1 of the existing CALGreen Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 35 percent of the waste generated, or 910 tons

of debris per year. As described in the Project Description, demolition is expected to take 75 days (see Table 4, *Construction Schedule*). As such, this would equate to approximately 35 tons of solid waste per day. The three landfills have a combined total daily disposal availability of 10,159 tons per day, which would be sufficient for the Project's construction-related landfill needs.

Operation

CalEEMod estimates solid waste generation for the analyzed Project would be 314 tons per year per (Appendix A). Per CalEEMod generation rate for commercial office use of 0.93 tons per year per 1,000 SF, the existing site generates an estimated 178 tons per year. Therefore, solid waste generation would increase with the Project compared to existing uses on the site. However, at least 75 percent of the solid waste is required to be recycled pursuant to AB 341, which would reduce the volume of landfilled solid waste to approximately 78.5 tons per year or 1.5 tons of solid waste per week.

Additionally, in the event that business operations result in the generation of 2 cubic yards or more of commercial solid waste per week, the business would be required to arrange for organic waste recycling services pursuant to AB 1826.

As described above, the supporting landfill facilities have a remaining capacity of approximately 7,473 tons per day. Thus, the landfills would be able to accommodate the addition of 1.5 tons of waste per week from operation of the Project. Implementation of the Project would result in less than significant impacts on landfill capacity.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

e) The Project would comply with federal, State, and local management and reduction statutes and regulations related to solid wastes.

As discussed above, the Project would result in redevelopment of the existing site that would generate an increased amount of solid waste. However, pursuant to Section 5.408.1 of the California Green Building Standards Code, all construction would be required to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. AB 341 requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the Project would be required to be consistent with all mandatory federal, State, and City regulations related to solid waste. Therefore, impacts related to compliance with solid waste regulations would not occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

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

Impact Analysis:

a) The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

The Project site is not located within a fire hazard zone (CAL FIRE, 2025). Additionally, the Project site is not located within an evacuation plan area, nor does it abut any generalized evacuation routes (Orange City Fire Department, n.d.). Therefore, Project construction activities would not interfere with emergency response in or evacuation plans for the Project site vicinity.

As previously discussed, the Project site would include a 28-foot-wide internal drive aisle, which doubles as the fire lane for emergency vehicle access during Project operation. Furthermore, the Project's development plans would be reviewed by the City to ensure adequate levels of emergency service could be provided to the Project site. Therefore, potential impacts related to an emergency response or evacuation would not occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

b) The Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors.

The Project site is currently fully developed and is located within an urbanized area of the City of Orange. The site is adjacent to a roadway, a railroad, and industrial, commercial, and residential development. The Project site is not adjacent to any wildland areas, and as determined by the CAL FIRE Hazard Severity Zone map, is not located within a fire hazard zone. In addition, the Project would be required to be developed in accordance with the requirements of the California Fire Code, as adopted by the City's Municipal Code, and the Project's plans would be reviewed by the City's Building and Safety Services during the permitting process to ensure that they meet fire protection requirements. The Project site does not include any slopes. In addition, because the Project is fully developed and located within an urbanized area, the Project site and vicinity does not contain any dry fuels or other factors that would exacerbate fire risks associated with prevailing winds such as the Santa Ana winds. Thus, the Project would not be located on a site or under conditions that would exacerbate wildfire risks and expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and no impact would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

c) The Project 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.

As described previously, the Project site is fully developed and located within an urbanized area that is not designated as being within a wildfire hazard zone. The Project does not include the installation or maintenance of any infrastructure that would exacerbate fire risks or that may result in temporary or ongoing impacts to the environment. Therefore, impacts related to infrastructure that could exacerbate fire risks would not occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

d) The Project 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.

As described previously, the Project site is fully developed and located within an urban area that is not designated as being within a wildfire hazard zone. In addition, the Project site is flat and surrounded by flat areas. There are no slope or hillsides that would become unstable as a result of development of the Project. Therefore, impacts related to flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would not occur as a result of the Project.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: No impact.

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

Impact Analysis:

a) As described in Section 4, *Biological Resources*, the Project site is located within an urban area and is surrounded by residential, commercial, and industrial development. The Project site is currently developed with three office buildings, paved parking lots, landscaping, and ornamental trees. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the USFWS, CDFW, or CNPS occur on the site. Ornamental trees are present along the Project’s frontage on Glassell Street and Fletcher Avenue, within the City’s ROW, and within the interior of the site. These trees may be utilized by nesting birds and raptors. Therefore, MM BIO-1 is proposed, which requires that pre-construction surveys be conducted if vegetation is required to be removed during nesting bird season. With the implementation of MM BIO-1, impacts related to nesting birds would be reduced to a less-than-significant level. The Project includes the removal of a total of 232 trees, which includes removal of 231 trees from the interior of the site and one City of Orange tree from within the ROW, which would require a tree removal permit. To reduce impacts and promote good tree health for the existing trees during Project construction, MM BIO-2 is proposed. With the implementation of MM BIO-2, potential impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance would be less than significant.

As described in Section 5, *Cultural Resources*, the Project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as “historical resources” as defined by CEQA. In addition, the Project would not result in significant impacts to

nearby historic resources. However, in the unlikely event that potential archaeological resources are discovered during grading, excavation, or other construction activities, the applicant has agreed to incorporate MM CUL-1 into the Project. MM CUL-1 requires that work in the vicinity of a find be halted until the find can be assessed for significance by a qualified archaeologist to determine appropriate treatment. Therefore, potential impacts related to cultural resources would be reduced to a less-than-significant level. Likewise, as described in Section 18, *Tribal Cultural Resources*, the site has the potential to contain tribal cultural resources. Therefore, MM TCR-1 through MM TCR-3 have been included to include monitoring of native soils and to ensure that any inadvertent discovery of potential tribal cultural resources during ground-disturbing activities would be less than significant.

As described in Section 7, *Geology and Soils*, the Project site is underlain by sediments identified as late to middle Pleistocene-aged old alluvial fan deposits with a high potential for fossils starting at a depth of five feet below the surface. Thus, the applicant has agreed to incorporate MM GEO-1 into the Project to require the preparation of a PRIMP and paleontological monitoring during ground-disturbance activities greater than five feet in depth within native soil. Incorporation of MM GEO-1 into the Project would reduce potential impacts to paleontological resources to a less-than-significant level.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures: MM BIO-1, MM BIO-2, MM CUL-1, MM GEO-1, MM TCR-1, MM TCR-2, and MM TCR-3, as listed previously.

Significance Determination After Mitigation: Less than significant.

b) Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. CEQA Guidelines, Section 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

The Project site is currently fully developed with three office buildings, a paved lot, and ornamental landscaping. The Project would redevelop the site with a one-story, 298,988 SF industrial building with manufacturing and warehousing uses, consistent with the Light Industrial land use designation and M-2 zoning. As previously described, all potential impacts related to implementation of the Project would be less than significant or reduced to a less-than-significant level with implementation of mitigation measures. Therefore, the cumulative effect of the Project taken into consideration with other development projects in the area would be limited, because the Project would develop the site in consistency with the General Plan. Therefore, any cumulative impacts associated with the Project would be consistent with impacts disclosed in the General Plan EIR for buildout based on the General Plan.

As discussed in Section 3, *Air Quality*, SCAQMD's CEQA Air Quality Handbook methodology describes that any project that result in daily emissions that exceed any of these thresholds would have both an individually

(project-level) and cumulatively significant air quality impact. If estimated emissions are less than the thresholds, impacts would be considered less than significant. As shown in Table AQ-2, CalEEMod results indicate that construction emissions generated by the Project would not exceed SCAQMD regional thresholds. Operational emissions associated with the Project were modeled using CalEEMod and are presented in Tables AQ-3 and AQ-5. As shown, the Project would result in long-term regional emissions of the criteria pollutants that would be below the SCAQMD's applicable thresholds. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant impacts, and operational impacts would be less than significant.

Global climate change occurs as the result of global emissions of GHGs. An individual development project does not have the potential to result in direct and significant global climate change effects in the absence of cumulative sources of GHGs. As discussed in Section 8, *Greenhouse Gas Emissions*, the Project's total annual GHG emissions at buildout would not exceed the SCAQMD's Tier 3 GHG emissions threshold of 3,000 MTCO₂e per year. As shown on Table GHG-2, the Project would result in approximately 2,247 net new MTCO₂e emissions per year. Therefore, the Project would not result in cumulative impacts related to GHG emissions.

Overall, impacts to environmental resources or issue areas would not be cumulatively considerable; and cumulative impacts would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant.

c) The Project proposes redevelopment of the site for a new single-story plus mezzanine industrial building. As described previously, the Project site is within an urban area and surrounded by consistent land uses. The Project would not consist of any use or any activities that would result in a substantial negative affect on persons in the vicinity. All resource topics associated with human beings and the Project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts or less-than-significant impacts with implementation of existing plans, programs, or policies, or incorporation of mitigation measures into the Project.

As discussed in Section 3, *Air Quality*, the unmitigated combined construction and operational cancer risk for the maximally impacted sensitive receptor is 10.07 in one million, which exceeds the SCAQMD's 10 in one million cancer risk threshold. To reduce potentially significant impacts, MM AQ-1: Tier 4 Construction Equipment is proposed. With the implementation of MM AQ-1, the combined construction and operational cancer risk for the maximally impacted sensitive receptor would be 9.48 in one million, which is below the significance threshold of 10 in one million.

Therefore, with the implementation of MM AQ-1, the Project would not result in substantial adverse impacts on human beings, either directly or indirectly.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures: MM AQ-1, as listed previously.

Significance Determination After Mitigation: Less than significant.

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MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring plan. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring plan must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, the following *Mitigation Monitoring and Reporting Program* has been prepared for the analyzed Project. The table identifies Plans, Programs, and Policies (PPPs) and Mitigation Measures (MMs) required by the City to mitigate or avoid significant adverse impacts associated with the implementation of the project. This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the actions taken to implement each mitigation measure; and (3) retention of records in the City's 2411 N Glassell Street project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the MMRP. If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the Initial Study/Mitigated
- Negative Declaration, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.
- The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. Such changes could include reassignment of monitoring and reporting responsibilities, plan redesign to make any appropriate improvements, and/or modification, substitution or deletion of mitigation measures subject to conditions described in CEQA Guidelines Section 15162. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.

**MITIGATION MONITORING AND REPORTING PROGRAM
MITIGATED NEGATIVE DECLARATION NO. 25-0002**

PROJECT NAME: 2411 North Glassell Street Project

PROJECT LOCATION: 2411 North Glassell Street, Orange, CA 92865

PROJECT DESCRIPTION: The Project would demolish the three existing buildings on the site and redevelop the site with a one-story (plus mezzanine), 298,988-square-foot industrial building with manufacturing and warehousing uses. Additional improvements would include landscaping, utility connections, stormwater facilities, and fencing, as well as pavement of parking areas, loading areas, and driveways.

LEAD AGENCY: City of Orange

CONTACT PERSON/TELEPHONE NO.: Arlen Beck, Senior Planner, Community Development Department, (714) 744-7272

APPLICANT: Rexford Industrial Realty, Inc

CONTACT PERSON/TELEPHONE NO.: Luis Gomez, Vice President, Development, (424) 465-2061

No.	Plan, Program, Policy (PPP) / Mitigation Measure (MM)	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
Aesthetics						
PPP AES-1	Exterior Lighting. Exterior lighting on the Project site shall conform to the regulations within Municipal Code Section 17.12.030. Lighting on any premises shall be directed, controlled, screened or shaded in such a manner as not to shine directly on surrounding premises.	Prior to Building Permits City of Orange Building & Safety	Prior to Building Permits City of Orange Building & Safety			
Air Quality						
PPP AQ-1	Rule 403 Fugitive Dust. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: <ul style="list-style-type: none">All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.	Prior to Demolition, Grading and Building Permits City of Orange Building & Safety	During Construction City of Orange Building & Safety			

No.	Plan, Program, Policy (PPP) / Mitigation Measure (MM)	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	<ul style="list-style-type: none"> The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less. 					
PPP AQ-2	Rule 1113 Architectural Coatings. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.	Prior to Building Permits City of Orange Building & Safety	During Construction City of Orange Building & Safety			
PPP AQ-3	Rule 402 Nuisance Odors. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	Prior to Demolition, Grading and Building Permits City of Orange Building & Safety	During construction City of Orange Building & Safety			
MM AQ-1	Tier 4 Construction Equipment. During construction, the Project shall use Tier 4 Final or superior equipment for engines exceeding 400 horsepower. If construction equipment cannot meet Tier 4 Final engine certification standards, the Project representative or contractor shall	Prior to Demolition, Grading and Building Permits	During Construction City of Orange Building & Safety			

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	provide a future study with written findings, backed by substantial evidence, for approval by SCAG before resorting to alternative technologies or strategies. Potential alternative strategies may encompass the use of Tier 4 Interim equipment, reducing the number and/or horsepower rating of construction equipment, or limiting simultaneous equipment operation. All equipment shall undergo tuning and adhere to the manufacturer's recommended maintenance schedule and specifications. Maintenance records for each piece of equipment, along with those of their contractors, shall be available for inspection and kept on-site for a minimum of two years following construction completion. An exception to this requirement may be considered if a project can demonstrate that Tier 4 engines are unnecessary to reduce emissions below significance thresholds.	City of Orange Building & Safety				
Biological Resources						
MM BIO-1	Conduct Pre-construction Nesting Bird Survey. If vegetation removal or initial grading occurs during the breeding season, nesting bird surveys shall be conducted by a qualified biologist for nesting raptors and migratory birds, and within an additional 100-foot survey buffer (for passerines) and 300-foot buffer for raptors within 3 days of construction. If nests of listed birds, migratory birds, raptors, or other sensitive species are documented, active nests shall be avoided, and a nest buffer shall be designated around each nest. Nest buffers shall be determined at the discretion of the qualified biologist based on the location and species occupying the nest. Species that are not covered by the	Prior to Demolition and Grading Permits City of Orange Planning	Prior to Demolition and Grading Permits Qualified Biologist			

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	MBTA (such as European starling, house sparrow, Eurasian collared dove, etc.) shall not require a nest buffer. The perimeter of this nest buffer shall be clearly demarcated, and all construction activities shall be prohibited within the delineated area until a qualified biologist has determined that the nest has either successfully fledged, been depredated, or failed due to other causes. Construction activities may proceed within the non-disturbance buffer if a qualified biologist is present to monitor active nests and determines that construction activities are not causing indirect or direct disturbance to a nest.					
MM BIO-2	<p>Tree Protected Zone. The Project shall establish a Tree Protected Zone (TPZ) to preserve existing trees during construction. The TPZ encompasses the area within the dripline of the tree and extends at least five feet beyond the dripline, or 15 feet from the trunk of the tree, whichever is greater. The TPZs shall be identified when construction plans are finalized and shall be shown on the final plan set. Underground services such as utility lines, irrigation, or piping shall be placed outside the TPZ. Screening wall construction would not be subject to the TPZ.</p> <p>Temporary orange safety fencing shall be installed prior to ground-disturbing operations to clearly delineate the TPZ. The fence shall stay in place throughout grading and construction. If pruning is required to provide adequate construction clearance, all pruning shall be completed by a Certified Arborist or Tree Worker, not by construction personnel.</p>	<p>Prior to Demolition and Grading Permits</p> <p>City of Orange Planning</p>	<p>During Construction</p> <p>Certified Arborist</p>			

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	All contractors shall conduct operations in a manner that will prevent damage to protected trees. No work, grading, excavation, construction, storage, parking, or dumping shall occur within the fenced TPZ. Construction of underground services shall not cause impacts in the TPZ. The fencing may not be relocated or removed without permission of a qualified arborist or biologist and shall remain in-place until all site work has been completed. If any protected trees are injured during construction, it shall be evaluated as soon as possible by the qualified arborist or biologist so that appropriate treatments can be applied. Any decayed or diseased trees identified during construction shall be removed to prevent the spread of disease, pathogens or pests and for fire safety.					
Cultural Resources						
MM CUL-1	<p>Inadvertent Discovery. In the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g).</p> <p>If the discovered resource(s) appears Native American in origin, a Native American Monitor shall be contacted to</p>	<p>Prior to Grading Permits</p> <p>City of Orange Planning</p>	<p>During Construction</p> <p>City of Orange Planning</p>			

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	<p>evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources. The discovery would also be reported to the City and the South Central Coastal Information Center (SCCIC).</p> <p>Prior to the issuance of any permits for ground-disturbing activities that include the excavation of soils (including as grading, excavation, and trenching), the City shall ensure that all Project grading and construction plans and specifications include requirement to halt construction activity and contact an archaeologist as specified above.</p>					
PPP CUL-1	<p>Human Remains. In the event that human remains are encountered on the Project site, work within 50 ft of the discovery shall cease and the County Coroner shall be notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. Prior to the issuance of grading permits, the City Community and Planning, Building, and Code Enforcement Department Director, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.</p>	<p>Prior to Grading Permits</p> <p>City of Orange Planning</p>	<p>During Construction</p> <p>City of Orange Planning</p>			

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Geology and Soils						
MM GEO-1	<p>Paleontological Resources. Prior to the issuance of the grading permit, the Applicant shall provide a letter to the City of Orange Planning Division, or designee, from a paleontologist selected from the roll of qualified paleontologists maintained by the City, stating that the paleontologist has been retained to provide services for the Project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite for the review and approval by the City. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource surveillance. The PRIMP shall also require paleontological monitoring for ground disturbing activities greater than five feet in depth within native soil, as determined by the Project paleontologist.</p> <p>In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.</p> <p>Criteria for discard of specific fossil specimens will be made explicit. If a qualified paleontologist determines that impacts to a sample containing significant</p>	<p>Prior to Grading Permits</p> <p>City of Orange Planning</p>	<p>During Construction</p> <p>Qualified Paleontologist</p>			

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	paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource. A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils, shall be prepared by the paleontologist and submitted to the appropriate City personnel.					
PPP GEO-1	Compliance with California Building Code. Prior to issuance of any construction permits, the Project is required to demonstrate compliance with the California Building Code as included in the City's Municipal Code Chapter 15.04 to preclude significant adverse effects associated with seismic hazards. California Building Code related and geologist and/or civil engineer specifications for the project are required to be incorporated into grading plans and specifications as a condition of construction permit approval.	Prior to Building Permits City of Orange Building & Safety	Before Construction City of Orange Building & Safety			

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Hazards and Hazardous Materials						
PPP WQ-1	NPDES/SWPPP. Listed below in <i>Hydrology and Water Quality</i> .	Prior to Grading and Demolition Permits City of Orange Public Works	Prior to Construction City of Orange Public Works			
Hydrology and Water Quality						
PPP WQ-1	NPDES/SWPPP. Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building and Safety Division and Public Works Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Prior to Grading and Demolition Permits City of Orange Public Works	Prior to Construction City of Orange Public Works			
PPP WQ-2	FWQMP. Prior to the approval of the Grading Plan and issuance of Building and Grading Permits a FINAL Priority Water Quality Management Plan (FWQMP) shall be submitted to and approved by the City. The FWQMP shall identify all Post-Construction, Site Design. Source Control, Low Impact Development, and any Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to	Prior to Grading and Building Permits City of Orange Building and Public Works	Prior to Construction City of Orange Building and Public Works			

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	minimize any potential adverse effects on receiving waters.					
Tribal Cultural Resources						
MM TCR-1	<p>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains,</p>	<p>Prior to Ground Disturbing Activities</p> <p>City of Orange Planning</p>	<p>During Construction</p> <p>Native American Monitor</p>			

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	places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.					
MM TCR-2	Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.	During Ground Disturbing Activities City of Orange Planning	During Construction Native American Monitor			
MM TCR-3	Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	During Ground Disturbing Activities	During Construction			

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	<p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>	City of Orange Planning	Native American Monitor			
PPP CUL-1	Human Remains. Listed previously in <i>Cultural Resources</i> .	<p>Prior to Grading Permits</p> <p>City of Orange Planning</p>	<p>During Construction</p> <p>City of Orange Planning</p>			