9822 RUSSELL AVENUE TOWNHOME PROJECT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Acronym List

ADA	Americans with Disabilities Act
ADT	Average Daily Trips
AQMP	Air Quality Management Plan
AB	Assembly Bill
AFY	Acre-Feet Yearly
APN	Assessor Parcel Number
BMPs	Best Management Practices
CAA	Clean Air Act
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
City	City of Garden Grove
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CMU	Concrete Masonry Unit
CO	Carbon Monoxide
CRHR	California Register of Historical Resources
CY	Cubic Yards
DAMP	Drainage Area Management Plan
dBA	A-weighted decibel
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
FTA	Federal Transit Administration
GGMC	Garden Grove Municipal Code
GGUSD	Garden Grove Unified School District
GPCD	Gallons per day per capita
GHG	Greenhouse Gas
HVAC	Heating, Ventilation and Air Conditioning

IS/MND	Initial Study/ Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
kBTU	thousand British thermal units
kWh	kilowatt-hour
LCFS	Low Carbon Fuel Standard
LID	Low Impact Development
LOS	Level of Service
LST	Local Significance Thresholds
MBTA	Migratory Bird Treaty Act
MG	Million Gallons
mgd	million gallons per day
MLD	Most Likely Descendant
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MTCO2e	metric tons carbon dioxide equivalent
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NOx	Nitrous Oxides
OCSD	Orange County Sanitation District
OCFA	Orange County Fire Authority
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
OPR	Governor's Office of Planning and Research
PM	Particulate Matter
PPV	peak particle velocity
PRC	Public Resources Code
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SLF	Sacred Lands File
SOx	Oxides of Sulfur
SR	State Route
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zone
VdB	velocity in decibels
VMT	Vehicle Miles Traveled
TIA	Traffic Impact Analysis
TTM	Tentative Tract Map
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
UWMP	Urban Water Management Plan
WDRs	Waste Discharge Requirements
WQMP	Water Quality Management Plan

1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.)
- California Code of Regulations, Title 14, Division 6, Chapter 3 (CEQA Guidelines, Sections 15000 et seq.).

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed redevelopment of the Project site with 26 residential townhomes. As required by CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Garden Grove (City), in consultation with other jurisdictional agencies, to determine if a Negative Declaration, Mitigated Negative Declaration (MND), Environmental Impact Report (EIR), or other type of CEQA compliance document is required for the Project.

This Initial Study informs City decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the Project. A "significant effect" or "significant impact" on the environment means *"a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project."* (CEQA Guidelines Section15382). Given the project's scope and level of detail, combined with technical analyses and current information about the site and environs, the City's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Public Resources Code Section 21003.1).
- Encourage the applicant to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (CEQA Guidelines Section 15004[b][3]).
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City and applicant to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (CEQA Guidelines Section15126.4).

Existing Regulations that Reduce Potential Impacts
Throughout the impact analysis in this Initial Study, reference is made to requirements that are applied to all development on the basis of federal, state, or local law, which effectively reduce the potential for environmental impacts to occur. Where applicable, these existing regulations are listed to show their effect in reducing potential environmental impacts. Where the application of these measures does not reduce an impact to below a level of significance, a project-specific mitigation measure is introduced.

1.2 DOCUMENT ORGANIZATION

This Initial Study includes the flowing sections:

Section 1.0 Introduction
Provides information about CEQA and its requirements for environmental review and explains that an Initial Study was prepared by the City to evaluate the Project's potential to impact the physical environment, and to determine if mitigation is required to reduce potential impacts to a less than significant level.

Section 2.0 Project Setting
Provides information about the Project's location, a description of existing site uses, and identifies the existing General Plan and zoning designations.

Section 3.0 Project Description
Includes a description of the Project's physical features, along with construction and operational activities.

Section 4.0 Environmental Checklist
Includes the Environmental Checklist and evaluates the Project's potential to result in significant adverse effects to the physical environment and identifies if mitigation is required to reduce potential impacts to a less than significant level.

Section 5.0 Document Preparers
Includes a list of persons that prepared this Initial Study/Mitigated Negative Declaration (IS/MND).

2 PROJECT SETTING

2.1 PROJECT LOCATION

The Project site is located at 9822 Russell Avenue, City of Garden Grove, in the central portion of the City, as shown in Figure 1, *Project Location*. The site is approximately 0.12 miles north of State Route 22 (SR-22) and one block west of Brookhurst Street, both of which provide regional access to the site. Local access to the site is provided by Brookhurst Street and Russell Avenue. Direct access to the site is provided by Russell Avenue to the north and Kerry Street to the west, as shown in Figure 2, *Aerial View*.

The Project site is identified as Assessor Parcel Number (APN): 098-081-19; and is located within the U.S. Geologic Survey (USGS) Anaheim 7.5 Minute Series Topographic Quadrangle, and within Section 5, Township 5 South, Range 10.

2.2 EXISTING PROJECT SITE LAND USES

The 1.81-acre Project site is currently developed with a church, preschool and daycare facility, a wireless communications facility, a parking lot, and landscaping areas. The church structure is located adjacent to Russel Avenue and is approximately 33 feet in height and topped with a church steeple and cross. The other two buildings (a one-story and a two-story) include a preschool, daycare, and office areas, and are connected by covered breezeway. The maximum height of the two-story preschool/office building is 28 feet. The exterior play area for the preschool is located along Kerry Street. Existing driveways are located along both Russell Avenue and Kerry Street, which provide direct access to parking areas to the south and east of the existing buildings.

The church sanctuary consists of 7,700 square feet, the office and meeting rooms used by the church total 7,892 square feet, and the preschool/daycare is 2,875 square feet, which totals 18,467 square feet of existing building space on the site. The existing preschool/daycare facility (Orangefield Child Development Center) is for children ages 2 to 6 years and has a licensed capacity for 60 students[1]. In addition to serving onsite uses, the existing parking lot is used by the adjacent Garden Grove Hyundai dealership for employee parking under a lease agreement with the existing property owner, which is not a permitted use.

Existing General Plan Land Use Designations. The Project site has General Plan Land Use designation of Low Density Residential (LDR), as shown in Figure 4, *Existing General Plan Land Use Designations*. The General Plan states that the Low Density Residential land use designation is characterized by detached, single-unit structures and accessory dwelling units, and allows up to 11 dwelling units per acre.

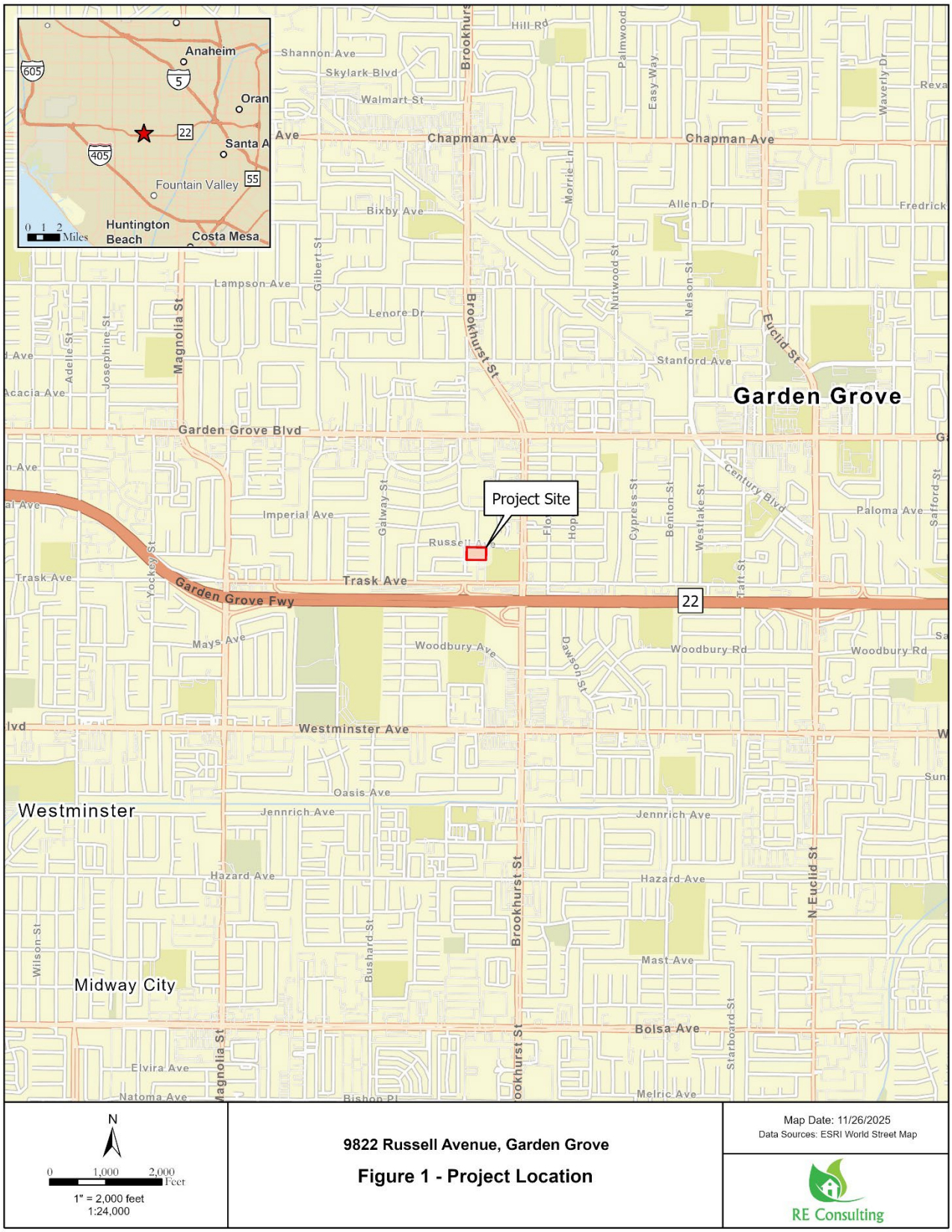
Existing Zoning Designations. The site is zoned Single-Family Residential (R-1), as shown in Figure 5, *Existing Zoning Designations*. Section 9.08.020.020 of the Garden Grove Municipal Code (GGMC) states that the R-1 zone is intended to provide for the establishment and promotion of single-family detached residences on individual lots and compatible associated activities. GGMC Section 9.08.020.020 details that churches, child daycare centers, religious schools, educational institutions are permitted within the R-1 zone with a Conditional Use Permit (CUP).

[1] CA Department of Social Services Facility Detail. Accessed: https://www.ccld.dss.ca.gov/carefacilitysearch/FacDetail/304371054

2.3 SURROUNDING LAND USES

The Project site is located within a developed and urban area and is adjacent to roadways, residential, school, and church uses as described below:

- **North:** Russell Avenue is adjacent to the north of the site followed by multi-family residential uses that have a General Plan land use of Low Medium Residential (LMR) and zoning designation of R-2 (Limited Multiple Residential).
- **East:** The Sunnyside Elementary School is adjacent to the east of the site on land that has a General Plan land use of Civic/Institutional (CI) and zoning designation of Open Space (O-S).
- **South:** Single-family residences and a church are located adjacent to the south, on land that has a General Plan land use of Low Density Residential (LDR) and zoning designation of Single-Family Residential (R-1).
- **West:** Kerry Street is adjacent to the west of the site followed by single-family residences on land that has a General Plan land use of Low Density Residential (LDR) and zoning designation of Single-Family Residential (R-1).



9822 Russell Avenue, Garden Grove

Figure 1 - Project Location

Verde St
Kerry St
Project Site
Russell Ave
Cross County Christian Church
Kerry St
Kerry St
N
0 50 100 Feet
1" = 100 feet
1:1,200
9822 Russell Avenue, Garden Grove
Figure 2 - Project Site Aerial
Map Date: 11/30/2025
Data Sources: ESRI World Imagery
RE Consulting

View of the Project Site from Russell Ave Facing Southwest

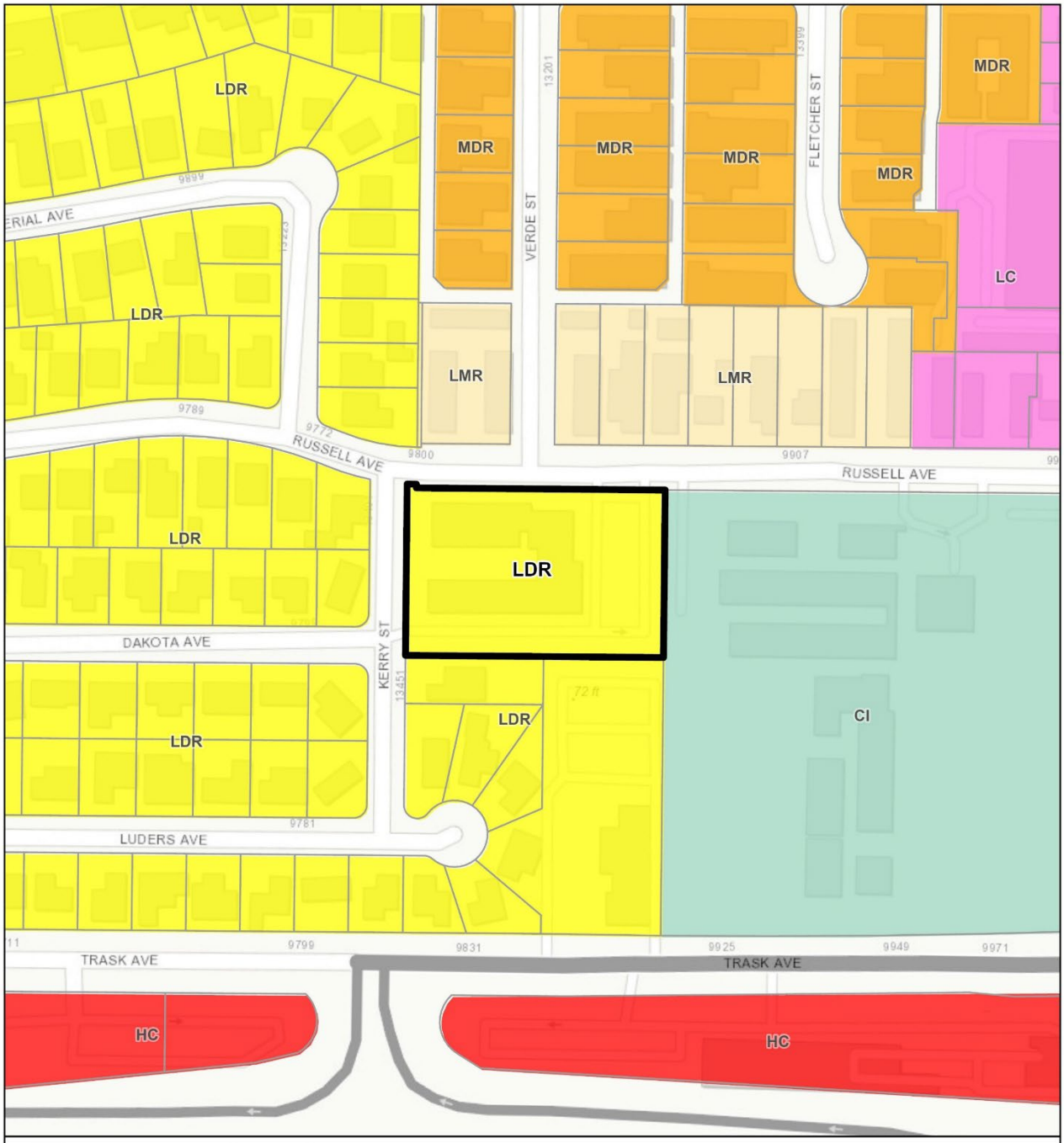
View of the Project Site from Kerry St Facing Southeast

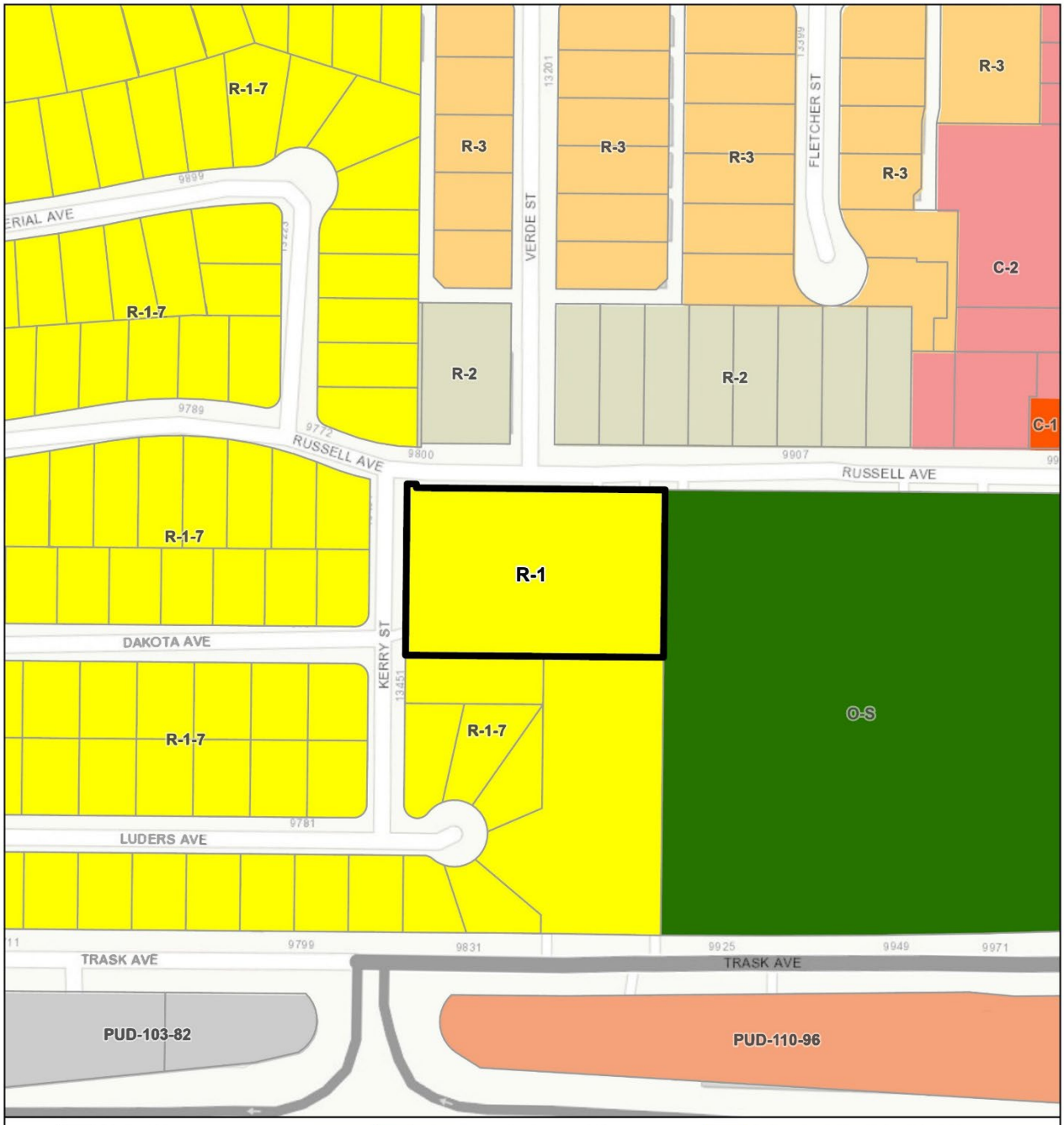
9822 Russell Avenue, Garden Grove

Figure 3 - Views of the Project Site

Map Date: 11/26/2025
Data Sources: Google Maps

RE Consulting


LDR
MDR
MDR
MDR
MDR
MDR
LC
LMR
LMR
LDR
LDR
LDR
CI
HC
HC
VERDE ST
FLETCHER ST
KERRY ST
RUSSELL AVE
RUSSELL AVE
DAKOTA AVE
LUDERS AVE
TRASK AVE
TRASK AVE
13201
13399
13451
9899
9789
9772
9800
9907
9781
9799
9831
9925
9949
9971
72 ft
Project Site
Parcel Boundary
Existing Land Use
CI - Civic/Institutional
HC - Heavy Commercial
LC - Light Commercial
LDR - Low Density Residential
LMR - Low Medium Density Residential
MDR - Medium Density Residential
N
0 85 170 Feet
1" = 170 feet
1:2,040
9822 Russell Avenue, Garden Grove
Figure 4 - Existing General Plan Land Use
Map Date: 11/26/2025
Data Sources: City of Garden Grove, World Topo Map
RE Consulting


R-1-7
R-3
R-2
C-2
C-1
R-1
O-S
VERDE ST
FLETCHER ST
RUSSELL AVE
DAKOTA AVE
KERRY ST
LUDERS AVE
TRASK AVE
PUD-103-82
PUD-110-96
Project Site
Parcel Boundary
Existing Zoning
C-1 - Neighborhood Commercial Zone
C-2 - Community Commercial Zone
O-S - Open Space Zone
PUD-103-82 - Planned Unit Development
PUD-110-96 - Planned Unit Development
R-1-7 - Single-Family Residential Zone
R-2 - Limited Multiple Residential Zone
R-3 - Multiple-Family Residential Zone
N
0 85 170 Feet
1" = 170 feet
1:2,040
9822 Russell Avenue, Garden Grove
Figure 5 - Existing Zoning Designation
Map Date: 11/26/2025
Data Sources: City of Garden Grove, World Topo Map
RE Consulting

3 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The applicant for the Project is requesting approval from the City of Garden Grove to demolish the existing church, preschool, wireless facility, and daycare facility buildings and improvements on the Project site and construct 26 two-story townhome residences, open space/recreation, and parking. Each residential unit would range in size from approximately 1,442 square feet to 1,800 square feet, have three or four bedrooms, and two-car garages. The 26 residences on the 1.81-acre site would result in a density of 14.4 dwelling units per acre. The Project would include parking, open space, ornamental landscaping, and associated infrastructure.

The Project requests the approval of a General Plan Amendment to change the land use from LDR to Low Medium Density Residential (LMR), which allows residential densities between 11 and 21 dwelling units per acre. The Project also includes a zone change to change the site zoning from R-1 to Planned Unit Development (PUD) with an R-2 (Limited Multiple Residential) base zoning designation used as the base guiding standards. The Project includes approval of a Site Plan and a Vesting Tentative Tract Map (TTM) for condominium purposes. Additionally, the existing CUPs for the wireless facility (CUP-554-01) and for the preschool (CUP-114-81) would be revoked.

3.2 PROJECT FEATURES

Residential Summary and Architecture
The Project would redevelop the 1.81-acre site to provide 26 two-story residential townhomes, as shown in Figure 6, *Conceptual Site Plan*. The two-story residential buildings would have a maximum height of 29 feet 9-inches. The Project would result in a density of 14.4 dwelling units per acre. The Project proposes three different floor plans that range in size from 1,442 square foot three-bedroom units to 1,800 square foot 4-bedroom units, as shown in Table 1. Each of the residences would have a two-car garage that would comply with the California Green Building Standards Code (CALGreen) and include EV charging infrastructure for new residences with attached private garages. Also, each residence would have a ground-level patio that would be delineated by a three-foot six-inch high vinyl fencing.

Table 1: Residential Unit Summary

Unit Type	Number of Units	Number of Stories	Number of Bedrooms	Number of Bathrooms	Square Footage
Plan 1	10	2	3	2.5	1,442
Plan 2	10	2	3 + loft	2.5	1,652
Plan 3	6	2	4	2.5	1,800

The townhome structures would be setback a minimum of 20 feet from the Kerry Street right-of-way, 11 feet from the 5-foot-wide sidewalk along Russell Avenue along building sides, and 15 feet from building frontages facing Russell Avenue. In addition, building structures would be a minimum of 20 feet from the single-family residences to the south, and a minimum of 15 feet from the eastern property line.

The residential structures would have articulated exterior designs of Spanish architectural style with recessed windows with shutters, Spanish tiled pitched roofs with multiple roof lines, gable accents, decorative metal

window awning and arbor trellis covered walkways, finished stuccos, Spanish tile accents, and other decorative architectural features (shown in Figures 7 through 9).

Parking and Circulation
In addition to two-car garages for each residence, the Project would include 33 open parking spaces, for a total of 85 onsite parking spaces. Circulation would be provided by a 30-foot-wide driveway on Russell that would lead to a 25-foot-wide interior drive isle that would provide access to parking and circle the site. Sidewalks providing ADA path of travel would be provided throughout the site and would connect to existing sidewalks along Russell Avenue and a new sidewalk along Kerry Street that would be installed by the Project. The Project also includes bicycle rack for short-term bike parking.

Open Space Recreation
The Project includes a 3,695 square foot central active open space recreation area with shade structures, BBQs with buffet countertop, picnic seating, community garden with raised planter boxes, open turf, bench seating, shade trees. The Project also includes 2,901 square feet of passive open space area and 2,106 square feet of private yards.

Landscaping
The proposed Project includes approximately 16,278 square feet (20.7% of the site) of landscaping that would include ornamental trees, shrubs, and ground covers, as shown in Figure 10, *Conceptual Landscape Plan*. New exterior lighting onsite would be provided to accent the landscaping, light signage, light walkways, light driveways, and for security. The new lighting would be focused on the Project site, shielded from offsite areas, and would be compliant with the City's lighting regulations.

Walls
The Project would install six-foot-high CMU walls along the south and east site boundaries. In addition, the front patio area of each residence would be delineated by a three-foot six-inch high vinyl fencing while providing ADA path of travel through the site, as shown in Figure 11, *Wall Plan*.

Infrastructure
Water and Sewer
The Project applicant would install new onsite water and sewer lines, which connect to the existing 6-inch diameter water main located in Russell Avenue and the existing 8-inch sewer main located within Russell Avenue to the north of the Project site.

Drainage
The Project would install a new onsite drainage system to accommodate the proposed site plan. Stormwater runoff would be captured by catch basins that would route runoff to biofiltration treatment devices prior to infiltration into site soils.

Energy
The proposed Project would not utilize natural gas and would install new onsite electrical infrastructure that would connect to the existing offsite electrical lines. The proposed Project would meet the CALGreen energy efficiency standards in effect during permitting of the Project, which are included in the GGMC as Section 18.04.010.

3.3 PROJECT CONSTRUCTION

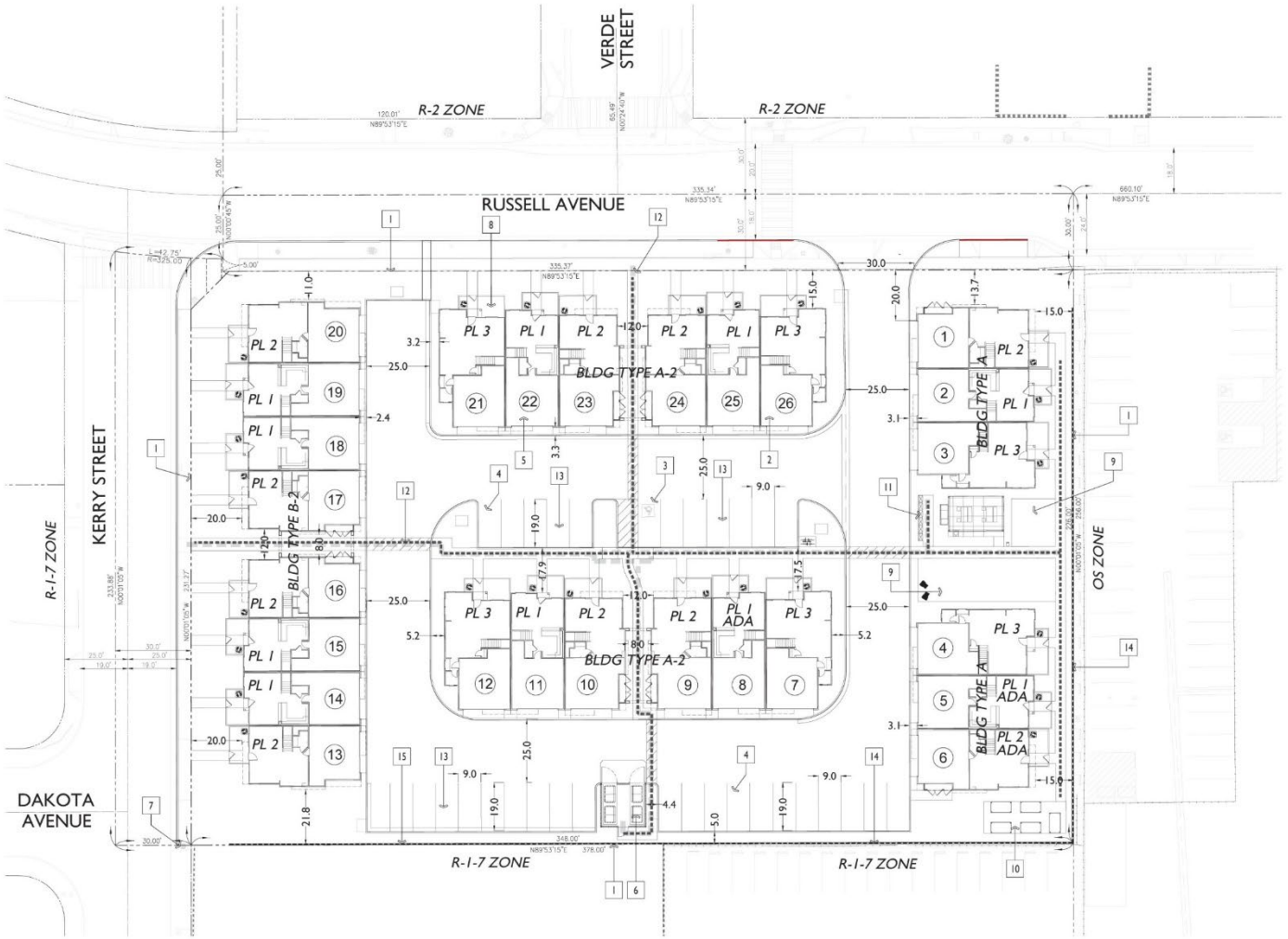
Construction activities for the Project would occur over approximately 11 months in the following stages: (1) demolition including removal of existing structures/asphalt/pavement; (2) site preparation; which includes clearing any remaining infrastructure, utilities, and trenching for the new utilities/services; (3) grading and excavation; (4) building construction; (5) paving; and (6) application of architectural coatings.

As part of site grading, the upper two feet or one foot below footings of soil would be removed and recompacted pursuant to California Building Code (CBC) requirements to provide a dense fill mat for structural support. Approximately 3,286 cubic yards (cy) of cut and 6,269 cy of fill material would be required for Project grading. The earthwork would balance onsite using approximately 2,984 cy of spoils from utility infrastructure trenching, and no import or export of soil would be required.

Consistent with the requirements of GGMC Chapter 8.47, the City's construction permitting limits construction activities to the hours between 7:00 a.m. to 7:00 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturdays. No construction work would be permitted on Sundays or federal holidays. The construction schedule listed in Table 3 is from California Emissions Estimator Model (CalEEMod) assumptions (Appendix A) and provides the modeling estimate of the working days per phase and construction and equipment, which is used for analysis purposes.

Table 2: Construction Schedule

Construction Phase	Working Days	Equipment
Demolition	20	Concrete/Industrial Saws, Rubber Tired Dozers, Tractors/Loaders/Back hoes
Site Preparation	2	Rubber Tired Dozers, Tractors/Loaders/Back hoes, Crawler Tractors, Graders, Trenchers, Dumpers/Tenders, Excavators, Skid Steer Loaders, Plate Compactors
Grading	4	Graders, Rubber Tired Dozers, Tractors/Loaders/Back hoes, Crawler Tractors
Building Construction	200	Cranes, Forklifts, Generator Sets, Tractors/Loaders/Backhoes, Welders
Paving	10	Pavers, Paving Equipment, Rollers, Cement and Mortar Mixers, Tractors/Loaders/Backhoes
Architectural Coating	15	Air Compressors



N

Not to Scale

9822 Russell Avenue, Garden Grove

Figure 6 - Conceptual Site Plan

Map Date: 1/26/2026
Data Sources: SUMMA Architecture, 1/12/2026

RE Consulting

BUILDING TYPE A - LEFT EXTERIOR ELEVATION

BUILDING TYPE A - FRONT EXTERIOR ELEVATION

BUILDING TYPE A - RIGHT EXTERIOR ELEVATION

BUILDING TYPE A - REAR EXTERIOR ELEVATION

MATERIAL SCHEDULE

1. ROOF - CONCRETE S TILE ROOFING
2. FASCIA - STUCCO OVER SHAPED FOAM CORNICE
3. WALL - EXTERIOR SAND FINISH STUCCO
4. VINYL WINDOW W/ STUCCO O/ E P.S. TRIM
5. RECESSED VINYL WINDOW W/ ARCHED SOFFIT
6. DECORATIVE GABLE/WALL ACCENT
7. DECORATIVE SHAPED FOAM CORBEL/SILL
8. DECORATIVE METAL AWNING
9. UTILITY CLOSET
10. DECORATIVE COMPOSITE SHUTTER
11. METAL POTSHELF
12. DECORATIVE EXTERIOR LIGHT FIXTURE
13. DECORATIVE METAL GRILLE
14. STUCCO PATIO LOW WALL W/ METAL GATE
15. STUCCO CONTROL JOINT
16. DECORATIVE TILE
17. TRELLIS BREEZEWAY ARBOR

BUILDING TYPE A2 - LEFT EXTERIOR ELEVATION

BUILDING TYPE A2 - FRONT EXTERIOR ELEVATION

BUILDING TYPE A2 - RIGHT EXTERIOR ELEVATION

BUILDING TYPE A2 - REAR EXTERIOR ELEVATION

9822 Russell Avenue, Garden Grove

Figure 7 - Elevations (Building Type A2)

Map Date: 1/26/2026
Data Sources: SUMMA Architecture, 1/12/2026

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BUILDING TYPE B2 - LEFT EXTERIOR ELEVATION

BUILDING TYPE B2 - FRONT EXTERIOR ELEVATION

BUILDING TYPE B2 - RIGHT EXTERIOR ELEVATION

BUILDING TYPE B2 - REAR EXTERIOR ELEVATION

MATERIAL SCHEDULE

1. ROOF - CONCRETE S TILE ROOFING
2. FASCIA + STUCCO OVER SHAPED FOAM CORNICE
3. WALL - EXTERIOR SAND FINISH STUCCO
4. VINYL WINDOW W/ STUCCO O/ E.P.S. TRIM
5. RECESSED VINYL WINDOW W/ ARCHED SOFFIT
6. DECORATIVE GABLE/WALL ACCENT
7. DECORATIVE SHAPED FOAM CORBEL/SILL
8. DECORATIVE METAL AWNING
9. UTILITY CLOSET
10. DECORATIVE COMPOSITE SHUTTER
11. METAL POTSHELF
12. DECORATIVE EXTERIOR LIGHT FIXTURE
13. DECORATIVE METAL GRILLE
14. STUCCO PATIO LOW WALL W/ METAL GATE
15. STUCCO CONTROL JOINT
16. DECORATIVE TILE
17. TRELLIS BREEZEWAY ARBOR

N

Not to Scale

9822 Russell Avenue, Garden Grove

Figure 8 - Elevations (Building Type B2)

Map Date: 1/26/2026
Data Sources: SUMMA Architecture, 1/12/2026

RE Consulting

N

Not to Scale

9822 Russell Avenue, Garden Grove

Figure 9 - Project Renderings

Map Date: 1/26/2026
Data Sources: SUMMA Architecture, 1/12/2026

RE Consulting

LEGEND

1. Central community open space area with metal or wood shade structure, BBQ counter space, and table seating for small social events and group gatherings.
2. Six community cluster mailboxes, per USPS review and approval.
3. Proposed wall, pilaster, gate or fence, per Wall & Fence Plan.
4. Proposed tree, per Planting Plan.
5. Transformer to be screened with landscape, quantity and final locations to be determined.
6. 4' wide community natural colored concrete sidewalk, with light top-cast finish and saw-cut joints.
7. Accessible parking stall and striping, per Civil plans.
8. 5 Raised community raised planter boxes within 400 Sq. Ft. DG.
9. Guest parking stall.
10. Natural colored concrete driveway, with light broom finish and tooled joints.
11. Short term bike parking (1 bike rack to accommodate 2 bike stalls).
12. Private patio / yard area, homeowner maintained.
13. Common area landscape, builder installed and HOA maintained.
14. Community dog bag station (black in color), for pet owners.
15. Property line.
16. Public street R.O.W.
17. Proposed public street sidewalk, per Civil plans.
18. Trash enclosure.
19. Bench seating.
20. 3'-0" High Monument Sign.

N

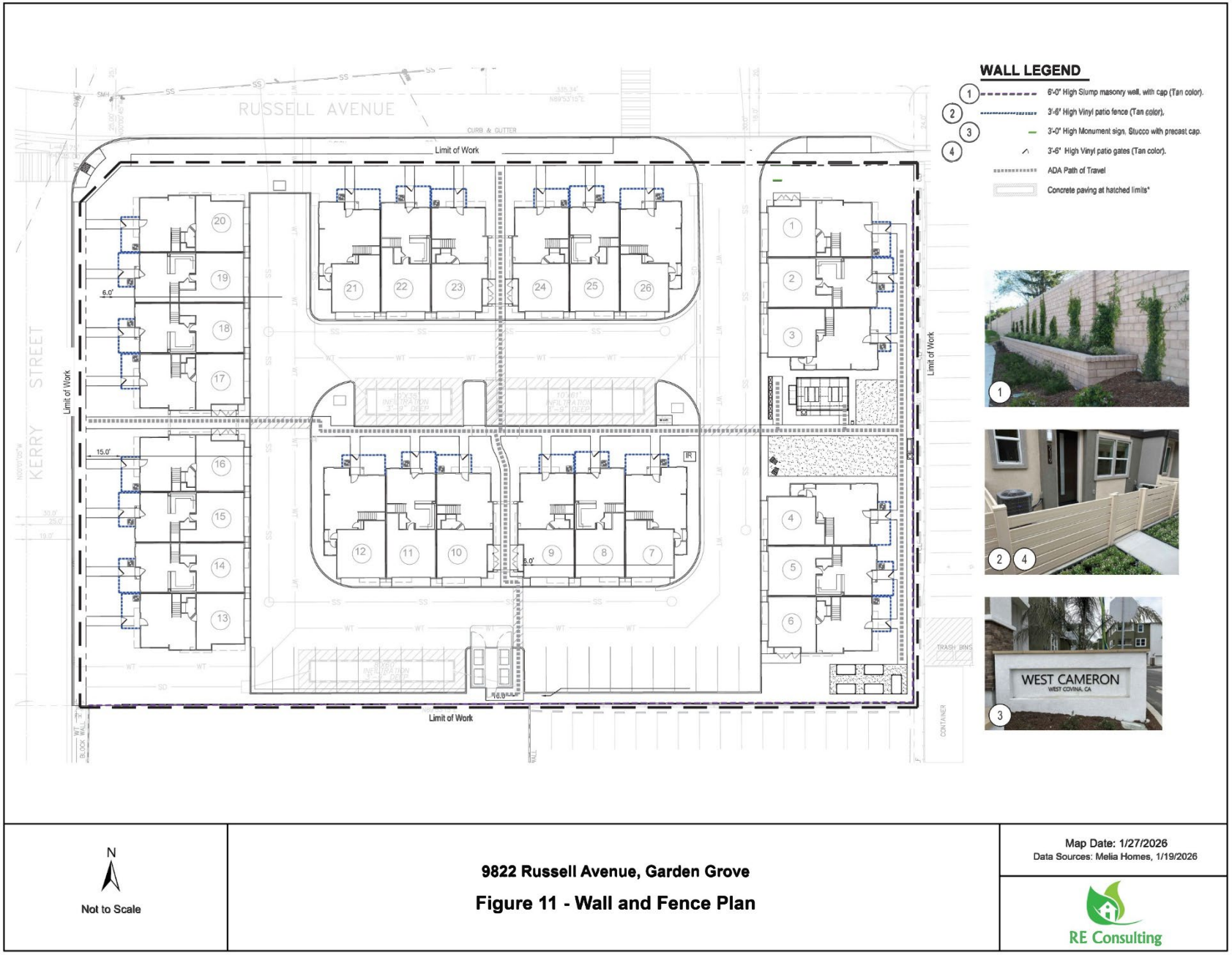
Not to Scale

9822 Russell Avenue, Garden Grove

Figure 10 - Conceptual Landscaping Plan

Map Date: 1/26/2026
Data Sources: Melia Homes, 1/19/2026

RE Consulting



N

Not to Scale

9822 Russell Avenue, Garden Grove

Figure 11 - Wall and Fence Plan

Map Date: 1/27/2026
Data Sources: Melia Homes, 1/19/2026

RE Consulting

3.4 GENERAL PLAN LAND USE AND ZONING

The Project includes a General Plan Amendment to change the land use designation of the site from Low Density Residential (LDR) to Low Medium Density Residential (LMR), as shown in Figure 12, *Proposed General Plan Land Use Designation*. The LMR land use allows a residential density ranging from 11 to 21 dwelling units per acre. The General Plan Land Use Element states that the LMR designation is intended for the development of single-family homes, accessory dwelling units, duplexes, triplexes, condominiums, and small lot subdivisions that:

- Provide a variety of housing types
- Provide access to schools, parks and other community services
- Provide a high-quality architectural design that preserves privacy
- Provide common spaces, recreation areas and services convenient to residents
- Provide an excellent environment for family life
- Preserve residential property values.

The Project also includes a zoning designation amendment to change the zoning of the site from Single-Family Residential (R-1) to Planned Unit Development (PUD) (Figure 13, *Proposed Zoning Designation*) with a general R-2 (Limited Multiple Residential) zoning designation used as the base guiding standards. The General Plan Land Use Element states that the PUD is a precise plan, adopted by ordinance that provides the means for the regulation of buildings, structures, and uses of land to facilitate the implementation of the General Plan. It is a way to create site-specific zoning requirements for a site. The PUD is intended to provide for a diversity of uses, relationships, and open spaces in an innovative land plan and design, while ensuring compliance with the provisions of the GGMC.

In addition, the Project includes a land subdivision through a Tentative Tract Map (TTM- 19447) to subdivide the Project site for sale purposes of the 26 townhomes, and approval of a Site Plan.

3.5 DISCRETIONARY APPROVALS

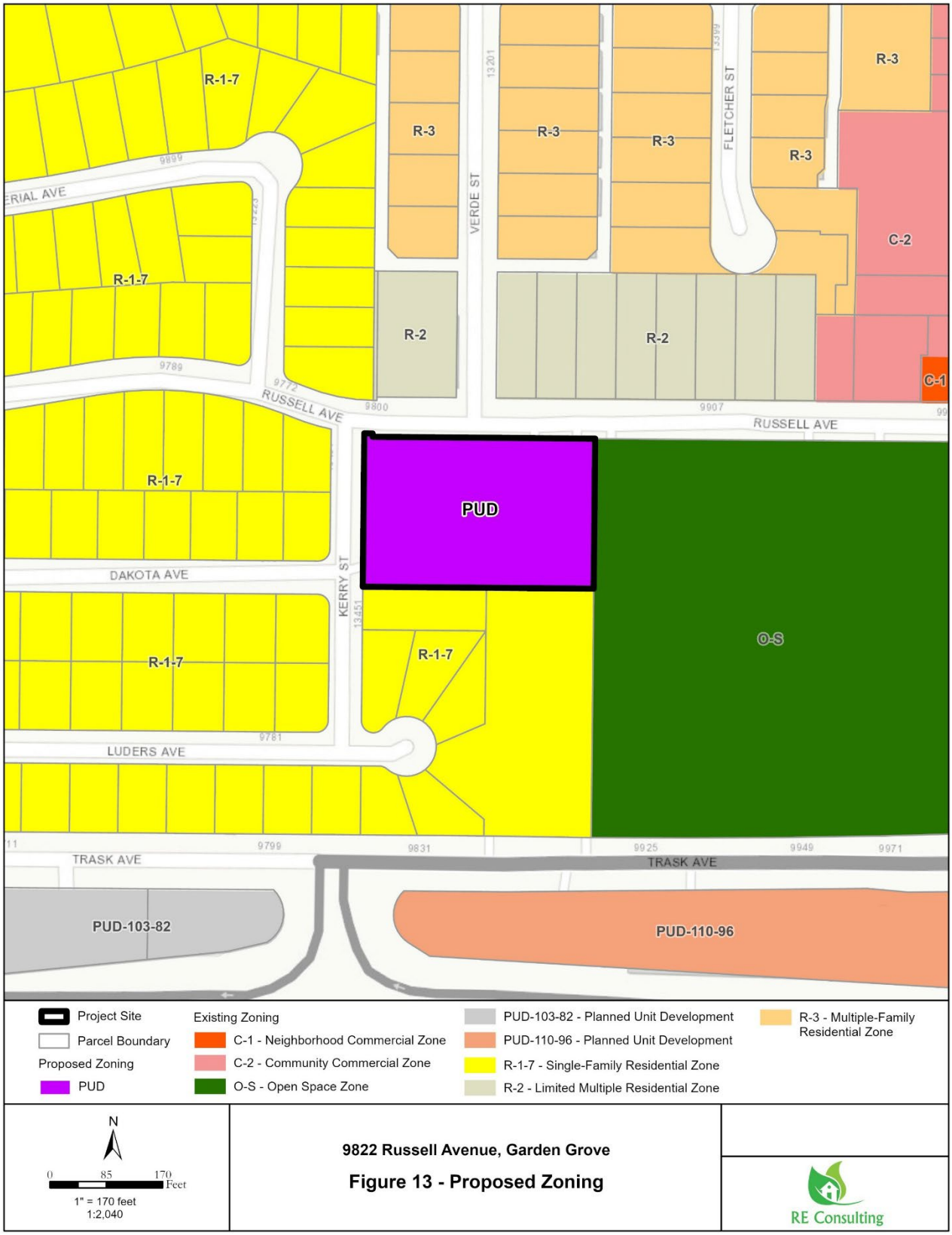
The following discretionary approvals from the City, as Lead Agency, are anticipated to be necessary for implementation of the Project:

- Adoption of a Mitigated Negative Declaration (MND) and associated Mitigation Monitoring and Reporting Program (MMRP)
- Approval of a General Plan Amendment to change the land use designation of the site from LDR to LMR
- Approval of an Amendment to the zoning of the site from R-1 to R-2
- Approval of a PUD
- Approval of a Tentative Tract Map (TTM-19447)
- Approval of a Site Plan, and

- Revocation of Conditional Use Permit Nos. CUP-114-81 and CUP-554-01

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

LDR
MDR
VERDE ST
FLETCHER ST
LC
LMR
RUSSELL AVE
DAKOTA AVE
KERRY ST
LUDERS AVE
CI
TRASK AVE
HC
Project Site
Parcel Boundary
Existing Land Use
CI - Civic/Institutional
HC - Heavy Commercial
LC - Light Commercial
LDR - Low Density Residential
LMR - Low Medium Density Residential
MDR - Medium Density Residential
N
0 85 170 Feet
1" = 170 feet
1:2,040
9822 Russell Avenue, Garden Grove
Figure 12 - Proposed General Plan Land Use
Map Date: 11/30/2025
Data Sources: City of Garden Grove, World Topo Map
RE Consulting


R-1-7
R-3
VERDE ST
FLETCHER ST
C-2
R-2
C-1
RUSSELL AVE
PUD
O-S
DAKOTA AVE
KERRY ST
LUDERS AVE
TRASK AVE
PUD-103-82
PUD-110-96
Project Site
Parcel Boundary
Proposed Zoning
PUD
Existing Zoning
C-1 - Neighborhood Commercial Zone
C-2 - Community Commercial Zone
O-S - Open Space Zone
PUD-103-82 - Planned Unit Development
PUD-110-96 - Planned Unit Development
R-1-7 - Single-Family Residential Zone
R-2 - Limited Multiple Residential Zone
R-3 - Multiple-Family Residential Zone
N
0 85 170 Feet
1" = 170 feet
1:2,040
9822 Russell Avenue, Garden Grove
Figure 13 - Proposed Zoning
RE Consulting

4 ENVIRONMENTAL CHECKLIST FORM

This section includes the completed environmental checklist form that is used to assist in evaluating the potential environmental impacts of the Project. The checklist form identifies potential Project effects as follows: 1) Potentially Significant Impact; 2) Less Than Significant with Mitigation Incorporated; 3) Less Than Significant Impact; and, 4) No Impact. Substantiation and clarification for each checklist response is provided in Section 5 (Environmental Evaluation). Included in the discussion for each topic are standard condition/regulations and mitigation measures, if necessary, that are recommended for implementation as part of the Project.

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

Environmental Factors Potentially Affected

☐	Aesthetics	☐	Agriculture and Forest Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☒	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and 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

4.2 DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

May 1, 2026

Signature Date

Priit Kaskla, AICP

Printed Name

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 offsite as well as onsite, 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: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less 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 Analysis," as described in (5) below, may be cross-referenced).

5) Earlier analysis 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 analysis of each issue should identify:

(a) the significance criteria or threshold used to evaluate each question; and

(b) the mitigation measure identified, if any, to reduce the impact to less than significant.

4.3 ENVIRONMENTAL CHECKLIST QUESTIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
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 and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Have a substantial adverse effect on a scenic vista?

No Impact. 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 a project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City's General Plan does not identify any scenic vistas within the City and the Project site and surrounding areas are urbanized, have generally flat topography, and do not contain any sensitive scenic vistas. As described in Section 2.3, *Surrounding Land Uses*, the Project site is located within a completely urban and developed area. Specifically, Russell Avenue is adjacent to the north of the site followed by multi-family residential uses. The Sunnyside Elementary School parking area followed by the school buildings is adjacent to the east of the site. Single-family residences and a church are located adjacent to the south. Kerry Street is adjacent to the west of the site followed by single-family residences. There are also no public parks located on, or adjacent to, the Project site, and the portion of the school adjacent to the east of the site consists of a parking lot and classroom buildings. Due to the limited topography and developed land uses in the Project area, views are limited to roadway corridors, which generally shows parked cars, some sidewalks, landscaping surrounding generally residential land uses, and utility poles with powerlines.

The proposed two-story townhomes would be 29 feet 9-inches in height and would be set back a minimum of 11 feet from the 5-foot-wide sidewalk for a minimum of a 16-foot setback from the Russell Avenue right-of-way, and 26 feet from the Kerry Street right-of-way. Although the two-story buildings would be one story higher than the nearby one-story residences and school structures, there are existing two-story structures on the Project site and adjacent parcels, and views along the road corridors would continue to be of parked cars, urban landscaped development, and residential, school, and church surrounding land uses. The proposed buildings would not project into the street corridor, and corridor views would not be hindered. Although the buildings would be higher than the existing one-story structures on and adjacent to the site, it would be consistent with the existing two-story buildings that also exist on and adjacent to the site and there are no scenic vistas that would be blocked by the proposed residential structures. As there are no identified scenic vistas within the vicinity of the site and views of the development around the Project site would remain the same, the Project would not result in an adverse effect on a scenic vista. No mitigation measures are required.

b) Substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The California Department of Transportation's (Caltrans) Landscape Architecture Program administers the Scenic Highway Program contained in the Streets and Highways Code, Sections 260–263. State Highways are classified as either Officially Listed or Eligible. There are no officially designated state scenic highways in the City of Garden Grove or in vicinity of the Project (Caltrans 2026). The closest state-designated scenic highway is a portion of State Route 91 (SR-91), which is located approximately 15 miles from the Project site. Therefore, due to the Project distance to a state scenic highway, the proposed Project does not have the potential to damage resources within a state-designated scenic highway. No mitigation measures are required.

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

Less than Significant Impact. The Project site is surrounded by developed areas that consist of roadways, school, church, and residences that include one and two-story buildings. As shown in Figure 3, the Project site contains one and two-story church, preschool/daycare, and office buildings, surface parking lot, and limited ornamental landscaping. The existing buildings are older wood framed stucco buildings with veneer brick, signage, and rectangular aluminum framed windows. The church building has a shingled pitched roof that extends from the first-floor roofline to the two-story high peak. The two other buildings have similar pitched shingled roofs, but with a reduced angle of pitch. The site is landscaped with lawn, limited ornamental shrubs, and trees adjacent to buildings and along the street frontages. There are no significant visual features or scenic resources within the Project site or surrounding area.

Construction

Construction of the Project would change the visual quality of the Project area with construction activities and equipment during the temporary (approximate 11 month) construction period. During this time, the appearance of the Project site would be altered by the removal of existing structures, equipment, paving, and landscaping. Construction activities (i.e. site preparation, grading, and the staging of construction equipment and materials) would be publicly visible to pedestrians and motorists along Kerry Street and Russell Avenue. However,

construction-related activities, materials, waste, and staging would be obscured from public view to the extent possible by installing temporary construction fencing along the street frontages of the Project site. Given the temporary nature of construction activities and the use of construction fencing to reduce potential impacts, visual impacts resulting from construction activities would be less than significant. No mitigation measures are required.

Operation

The Project would alter the existing views of the site by removing the existing church, preschool, daycare, office, wireless facility, and parking uses and redeveloping the site with two-story townhomes, landscaping, open space areas, and drive isles. As detailed in the Project Description and shown in Figures 7 through 9, the residential structures would have Spanish architectural style with recessed windows with shutters, Spanish tiled pitched roofs with multiple roof lines, gable accents, decorative metal window awning and arbor trellis covered walkways, finished stuccos, Spanish tile accents, and other decorative architectural features. The Project would provide a consistent landscaping theme throughout the site that includes ornamental trees, shrubs, and ground covers.

The proposed two-story townhomes would have a maximum height of 29 feet 9-inches, which would be lower than the existing church building roof of 33 feet in height (not including the steeple and cross) and slightly higher than the two-story preschool/office building that is approximately 28 feet in height. Similar to the proposed onsite uses, the existing residential structures within the Project vicinity are both one and two-stories in height. The proposed residential structures would have varying roof heights, slanted roofs, building and window recesses and projections, and other architectural features that would reduce the visual scale of the proposed structures. Additionally, the proposed residences would be set back a minimum of 11 feet from the 5-foot-wide sidewalk for a minimum of a 16-foot setback from the Russell Avenue right-of-way, and 26 feet from the Kerry Street right-of-way. Both the Kerry Street and Russell Avenue frontages of the site would be landscaped with trees, shrubs, and groundcovers, as shown in Figure 10, *Conceptual Landscape Plan*. The setbacks, landscaping, and perimeter walls would provide a visual buffer between the streets and the two-story townhomes. Given the existing visual character of the Project site and the proposed Spanish decorative architecture, development of the Project would alter, but not degrade the existing visual character or quality of the Project site and its surroundings.

General Plan. The Project site currently has a General Plan land use designation of Low Density Residential (LDR), as shown previously in Figure 4, *Existing General Plan Land Use Designations*. The General Plan describes that the LDR land use is characterized by detached, single-unit structures and accessory dwelling units, and allows up to 11 dwelling units per acre.

The proposed Project includes a General Plan Amendment to change the land use designation of the site to Low Medium Density Residential (LMR) that allows a residential density between 11 and 21 dwelling units per acre. Consistent with the proposed LMR designation, the Project would develop the 1.81-acre Project site with 26 residential townhomes, which would result in a density of 14.4 dwelling units per acre and be within the allowable LMR residential density. Therefore, the Project would be consistent with the density allowable under the proposed General Plan land use designations, and no conflict would occur.

Zoning. The site is zoned Single-Family Residential (R-1), as shown previously in Figure 5, *Existing Zoning Designations*. Section 9.08.020.020 of the GGMC states that the R-1 zone is intended to provide for single-family detached residences on individual lots and compatible associated activities. Section 9.08.020.020 of the

GGMC details that churches, child daycare centers, religious schools, educational institutions are permitted within the R-1 zone with a Conditional Use Permit (CUP).

The proposed Project includes a zoning designation amendment to change the zoning of the site from Single-Family Residential (R-1) to Planned Unit Development (PUD) with a general R-2 (Limited Multiple Residential) zoning designation used as the base guiding standards, which implements the LMR General Plan land use designation. The Project would redevelop the aged church, daycare, and preschool site to provide new residences. As shown in Table AES-1, the proposed Project would meet the PUD zoning standards that are based on the R-2 zone. The Project's structures would have varying roof heights, slanted roofs with decorative tile, building and window recesses and projections, and other architectural features that would provide visual scale and character to the proposed two-story structures. Therefore, the proposed Project would result in a less than significant impact related to scenic quality.

Table AES-1: Development Standards for the PUD Based on the R-2 Residential Zone

Standard	PUD / R-2 Zone Standard	Proposed Project
Maximum Density	21.0 units/acre	14.4 units/acre
Front Setback	20 feet to 1st and 2nd floor; 25 feet to 3rd floor	16-foot setback from the Russell Avenue right-of-way 26 feet from the Kerry Street right-of-way
Street Side Setback	10 feet to 1st and 2nd floor; 15 feet to 3rd floor	11 feet
Maximum Height	30 feet	29 feet 9 inches
Maximum Stories	2 stories	2 stories
Maximum Lot coverage	50 percent	43.2 percent

Overall, the proposed Project would be consistent with development standards required by the LMR General Plan land use designation and PUD zone with the R-2 (Limited Multiple Residential) base guiding standards and would not conflict with applicable regulation related to scenic quality. Hence, the proposed Project would not degrade the visual character of the Project site and surrounding area; and impacts would be less than significant. No mitigation measures are required.

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

Less than Significant Impact. The Project site is located within a developed urban area. Existing sources of light in the vicinity of the Project site includes: street lights, parking lot lighting, building illumination, security lighting, landscape lighting, and lighting from building interiors that pass-through windows. The exterior lighting on the Project site includes exterior building mounted lighting, parking lot lighting, and lighting at building entrances.

Construction

Although construction activities would occur primarily during daylight hours, construction activities could extend into the evening hours, as permitted by the GGMC Chapter 8.47, Noise Control, construction activities are allowed between 7:00 a.m. and 7:00 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturdays. Thus, during standard time, after daylight saving ends, construction could occur after the sun sets. However, any construction-related illumination would be used for safety and security purposes and would be shielded and directed toward work activity areas and to prevent light encroachment into adjacent residential areas. In addition, construction may include nighttime security lighting; however, this would be similar to the existing security lighting on adjacent uses and streetlights. Furthermore, the construction-related lighting would be

temporary (11 months). Therefore, construction of the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area, and light impacts associated with construction would be less than significant. No mitigation measures are required.

Operation

The proposed residences would include the provision of nighttime lighting for security purposes around the residential buildings, parking areas, and open space recreation areas. Implementation of the Project could contribute additional sources to the overall ambient nighttime lighting conditions. However, the Project is located within an urban area that includes various sources of nighttime lighting and all outdoor lighting would be hooded or appropriately angled away from adjacent land uses and would comply with City development requirements that provides specifications for directing lighting away from adjacent uses and intensity of security lighting. Because the Project area is within an already developed area with various sources of existing nighttime lighting, and the Project would be required to comply with the City's lighting regulations that would be verified by the City's Building and Safety Division during the permitting process, the lighting increase 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. No mitigation measures are required.

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. Generally, darker 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. However, the Project would not use highly reflective surfaces, or glass sided buildings. Although the residential buildings would contain windows, portions of the windows would be covered by inset into the buildings and separated by stucco, which would limit the potential for glare. As described previously, onsite lighting would be angled down and shielded, which would avoid the potential of onsite lighting to generate glare. In addition, the majority of vehicle parking would be located within garages and areas adjacent to the buildings. The Project would not contain large surface parking lots that could generate glare from numerous windshields aligned in one area. Therefore, the Project would not generate substantial sources of glare, and impacts would be less than significant. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing City Condition of Approval would reduce potential impacts related to aesthetics.

COA: Lighting: Project plans and specifications shall comply with City standard Conditions of Approval for lighting, which states that all lighting structures shall be placed so as to confine direct rays to the subject property. All exterior lights shall be reviewed and approved by the Planning Services Division. Lighting adjacent to residential properties shall be restricted to low decorative type wall-mounted lights, or a ground lighting system. Lighting shall be provided throughout all private drive aisles and entrances to the development per City standards for street lighting. Lighting in the common areas shall be directed, positioned, or shielded in such manner so as not to unreasonably illuminate the window area of nearby residences.

Mitigation Measures

No mitigation measures related to aesthetics are required.

References

California Scenic Highway Mapping System (Caltrans, 2026). Accessed at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Municipal Code. Accessed at: https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

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

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project site is developed for urban uses and located in an area that is developed for urban residential, church, and school uses. The Project site and vicinity is void of agricultural uses. The California Department of Conservation Important Farmland mapping identifies the Project site as Urban and Built-Up land (CDC 2025). 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 impact would occur, and no mitigation measures are required.

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

No Impact. As described in the previous response, the Project area is void of any agricultural uses. As shown in Figure 5, *Existing Zoning Designation*, the Project site is zoned for residential uses and is surrounded by areas zoned for residential and open space. No agricultural zoning is located in the vicinity of the Project area and no parcels within the Project vicinity have Williamson Act contracts (DLRP 2025). Therefore, implementation of the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Thus, no impact would occur, and no mitigation measures are required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project site is generally developed for urban uses and located in an area that is developed for urban uses. The Project site and vicinity is void of forest land or timberland. In addition, the Project site is zoned for residential uses and surrounded by areas zoned for residential and open space uses. Therefore, the Project would not conflict with existing forest land, timberland, or zoning for forest or timberland uses. Thus, no impact would occur, and no mitigation measures are required.

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

No Impact. As described in the previous response, the Project area is void of any forest land or land zoned for forest uses. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest uses. No impact would occur, and no mitigation measures are required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As described in the previous responses, the Project area 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 conversion of farmland to non-agricultural use or forest land to non-forest use. Thus, no impact would occur, and no mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

There are no existing regulations or City Conditions of Approval related to agriculture and forestry that would reduce impacts and are applicable to the Project.

Mitigation Measures

No mitigation measures related to agriculture and forestry are required.

References

California Department of Conservation Important Farmland Finder (CDC 2025). Accessed at: https://maps.conservation.ca.gov/dlrp/ciff/

California Department of Conservation Division of Land Resource Protection Williamson Act Maps (DLRP 2025). Accessed at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	☐	☐	☐	☒

The discussion below is based on the Air Quality, Energy, and Greenhouse Gas Impact Analysis, which is included as Appendix A and the Level of Service (LOS) Screening Analysis, which is included as Appendix B.

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

Less than Significant Impact. The City is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) is responsible for regulating and controlling emissions within the basin. The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources. The most recently adopted AQMP is the 2022 AQMP that was adopted by the SCAQMD Governing Board on December 2, 2022, and includes scientific and technological data, planning assumptions, and updated emission inventory methodologies.

As described in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993), for purposes of analyzing consistency with the AQMP, projects that are consistent with the regional population, housing, and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

The Project would redevelop the site to provide 26 residential townhomes on 1.81 gross acres. The Project would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. Thus, the Project would not be defined as a regionally significant project under CEQA and would not meet SCAG's Intergovernmental Review criteria.

The proposed Project would construct and operate 26 residential townhomes on the Project site under the proposed General Plan Land Use designation of Low Medium Density Residential (LMR). The LMR designation allows densities between 11 and 21 dwelling units per acre. The Project would result in 14.4 residential units per acre. As detailed below in Section 14, *Population and Housing*, the proposed 26 residences would result in approximately 90 residents at full capacity that would equate to a 0.05 percent increase in both the City's population and number of housing units in the City; and would be 0.4 percent of the SCAG projected increase in households within the City by year 2050. Additionally, the City's Regional Housing Needs Assessment (RHNA) for the 2021–2029 planning period identifies that the City's future housing need is 19,168 units for very-low income, low income, moderate income, and above moderate income households. The Project would be within the City's future housing need for the 2021–2029 planning period. As a result, the Project would not exceed growth projections, and therefore, is consistent with the AQMP.

In addition, as described in Response b), emissions generated by construction and operation of the Project would not exceed thresholds, which are based on the AQMP and are designed to bring the SCAB into attainment for the criteria pollutants for which it is in nonattainment. Therefore, because the Project does not exceed any of the emissions thresholds, it would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation and would not conflict with SCAQMD's goal of bringing the SCAB into attainment for all criteria pollutants. As such, it is consistent with the AQMP, and impacts related to conflict with the AQMP from the Project would be less than significant. No mitigation measures are required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. The SCAB has a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. The methodologies from the SCAQMD CEQA Air Quality Handbook are used in evaluating project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are listed in Table AQ-1. The SCAQMD's CEQA Air Quality Handbook methodology describes that any project that results 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 or reduced to below the thresholds with implementation of mitigation, impacts would be considered less than significant.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds[2]

Pollutant	Construction (lbs/day)	Operations (lbs/day)
NOx	100	55
ROG	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SOx	150	150
CO	550	550
Lead	3	3

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter

Construction

The proposed Project would redevelop the site with 26 new townhome residences within an 11-month construction period. Construction activities associated with the proposed Project would generate pollutant emissions from the following: (1) demolition and removal of the existing onsite improvements and hauling demolition debris offsite; (2) preparation of the site; (3) grading and excavation; (4) construction workers traveling to and from the Project site; (5) delivery and hauling of construction supplies to, and debris from, the Project site; (6) fuel combustion by onsite construction equipment; (7) building construction; application of architectural coatings; and paving. The volume of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

The demolition of the existing buildings and hardscape is anticipated to amount to 3,527 tons of debris over the 20-working day demolition phase. Also, based on the preliminary grading plan, the Project would not require import or export of material during the grading phase; however, for conservative analysis purposes, 1,000 cubic yards of export is assumed to account for potential spoils.

Although not criteria pollutants for which the region is in non-attainment, as detailed further in Section 9, *Hazards and Hazardous Materials*, due to the age of the existing structures, it is possible that asbestos-containing building materials and lead-based paint are present. As a result, asbestos and lead based paint surveys would be required. Further, abatement of any asbestos containing materials would be required prior to demolition of the existing buildings pursuant to the existing SCAQMD, Cal/OSHA, and Section 19827.5 of the California Health and Safety Code requirements. SCAQMD Rule 1403 sets forth specific procedures for the removal of asbestos and requires that an onsite representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of asbestos-containing materials. Mandatory compliance with the provisions of Rule 1403, through City permitting, would ensure that construction does not result in airborne asbestos. With compliance with AQMD Rule 1403, potential impacts related to asbestos air quality emissions would be less than significant.

Likewise, existing regulations specify actions to manage and control exposure to lead-based paint, including the Code of Federal Regulations Title 29, Section 1926.62 and California Code of Regulations Title 8 Section

[2] Regional thresholds are from the SCAQMD Air Quality Significance Thresholds, March 2015.

1532.1, that cover the demolition, removal, cleanup, transportation, and disposal of lead-containing material. Specifically, Cal/OSHA's Lead in Construction Standard requires a project to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction to ensure that lead based dust does not become airborne. With compliance with the Cal/OSHA requirements, potential impacts related to lead-based paint air quality emissions would be less than significant.

Regarding criteria pollutants, it is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions, from construction activities. Rule 403 would be implemented as a standard City construction Condition of Approval and 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 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. In addition, implementation of SCAQMD Rule 1113 that governs the ROG content in architectural coating, paint, thinners, and solvents, would further reduce construction emissions of ROG from the Project.

As shown in Table AQ-2, CalEEMod results indicate that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, emissions from construction activities would be less than significant, and no mitigation is required.

Table AQ-2: Maximum Regional Construction Emissions Summary

Maximum Daily Emissions	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2027	2.17	19.61	23.81	0.04	5.20	2.00
2028	13.78	12.16	17.79	0.03	0.67	0.40
Maximum Daily Emission (2027-2028)	**13.78**	**19.61**	**23.81**	**0.04**	**5.20**	**2.00**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

Operation

Operation of the proposed 26 residential townhomes would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as landscaping, applications of architectural coatings, and consumer products. Also, vehicular emissions would generate a substantial portion of the operational emissions from the Project. As detailed in Section 17, *Transportation*, the existing church, preschool and daycare uses are estimated to generate approximately 219 daily trips, including 37 trips during the a.m. peak hour and 28 trips during the p.m. peak hour. The proposed Project is anticipated to generate approximately 161 daily trips, with 11 trips during the a.m. peak hour and 14 trips during the p.m. peak hour.

The Project would result in 58 fewer daily trips, including 26 fewer trips during the a.m. peak hour, and 24 fewer trips during the p.m. peak hour than the existing uses on the site. This reduction in vehicle trips would result in a net decrease for ROG, NOx, CO, SO2, PM_{10}, and $PM_{2.5}$ daily emissions, as detailed in Table AQ-3. Therefore, the Project would result in reduced vehicular emissions compared to the existing site uses; and would not result

in an exceedance of the emissions thresholds. The Project's operational emissions would be less than significant. No mitigation measures are required.

Table AQ-3: Summary of Peak Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile	0.49	0.38	4.62	0.01	1.28	0.33
Area	0.78	0.01	1.48	<0.01	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total Operational Emissions	1.27	0.39	6.10	0.01	1.28	0.33
Existing Operational Emissions	1.55	0.96	9.57	0.02	2.08	0.55
Net Operational Emissions	- 0.28	- 0.56	- 3.47	- 0.01	- 0.79	- 0.22
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2008) recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Sensitive receptors can include residences, schools, playgrounds, childcare centers, athletic facilities. Such an evaluation is referred to as a localized significance threshold (LST) analysis. According to the SCAQMD's *Final Localized Significance Threshold Methodology*, "offsite 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 NOx, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project site is located in SRA 17, Central Orange County.

Construction

The localized thresholds from the mass rate look-up tables in SCAQMD's Final Localized Significance Threshold Methodology document, were developed for use on projects that are less than or equal to 5-acres in size or have a disturbance of less than or equal to five acres daily; and include thresholds for projects that would disturb one, two, three, four, or five acres. As the Project site is 1.81-acres, the SCAQMD criteria for LSTs is to assume that the proposed Project would disturb a maximum of 1.81 acres per day. Thus, construction emissions were evaluated by interpolating between the 1-acre and 2-acre disturbance thresholds to estimate thresholds for a 1.81-acre site (total site area).

Table AQ-4 identifies the localized impacts at the nearest receptor location in the vicinity of the Project, which is a residence located approximately 2.25 meters (7.38 feet) south of the Project site. Therefore, the closest SCAQMD threshold distance of 25 meters was applied (25 meters is the shortest distance from source to receptor contained in the SCAQMD emission lookup tables). As shown, Project construction-source emissions

would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Thus, implementation of the Project would not result in a localized air quality impact, and no mitigation is required.

Table AQ-4: Maximum Daily Localized Construction Emissions (lbs/day)

Construction Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
2027 (Year 1)				
Demolition	12.43	14.44	4.20	1.00
Site Preparation	18.37	19.78	0.88	0.81
Grading	17.00	17.83	0.91	0.84
Building Construction	11.46	15.23	0.37	0.34
Maximum On-site Emission (2027)	***18.37***	***19.78***	***4.20***	***1.00***
2028 (Year 2)				
Building Construction	10.95	15.21	0.33	0.30
Paving	4.88	7.21	0.19	0.18
Architectural Coating	1.08	1.49	0.02	0.02
Maximum On-site Emission (2028)	***10.95***	***15.21***	***0.33***	***0.30***
Maximum Daily Emissions	***18.37***	***19.78***	***4.20***	***1.00***
SCAQMD Screening Thresholds	108.50	671.30	5.60	3.80
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM_{10} = particulate matter 10 microns in diameter, $PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

Additionally, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD's standard construction practices (Rules 402 and 403). 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, which is implemented as a standard City construction Condition of Approval. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during construction, and impacts would be less than significant. No mitigation measures are required.

Diesel Particulate Matter (DPM) from construction is a source of airborne toxins that are generated by heavy-duty diesel engines. Peak localized emissions of DPM occur during demolition and earthwork phases of construction. Key sources include grading equipment, excavators, generators, and haul trucks. As provided in Section 3.3, *Project Construction*, the Project would result in a limited volume of demolition and earthwork completed over approximately 26 days and be limited to 7:00 a.m. to 7:00 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturdays, per GGMC Chapter 8.47. The California Air Resources Board (CARB) details that DPM is a subset of $PM_{2.5}$ and that NOx emissions from diesel engines can undergo chemical reactions in the atmosphere leading to formation of $PM_{2.5}$ (CARB 2026). As detailed in Table AQ-4, the maximum daily localized emissions of $PM_{2.5}$ are 26% of the screening threshold and the maximum localized daily emissions of NOx are 17% of the threshold. Due to the limited volumes of emissions, additional analysis of DPM construction emissions is not required.

Operation
According to the SCAQMD LST methodology, LSTs apply to stationary mobile sources. Projects that involve mobile sources that spend long periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational localized significance thresholds. The proposed Project would operate 26 residential townhome units, which do not involve vehicles idling or queueing for long periods. Therefore, due to the lack of significant stationary source emissions, impacts related to operational localized significance thresholds would be less than significant, and no mitigation measures are required.

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

No Impact. The proposed residential Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals*.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project would implement residential development that does not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by the Project are required to be in compliance with SCAQMD Rule 402, which would prevent nuisance odors.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with other emissions, such as odors, would not adversely affect a substantial number of people. No mitigation is required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations and City Condition of Approval would reduce potential impacts related to air quality.

SCAQMD Rule 402 – Nuisance: The Project plans and specifications shall implement compliance 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.

COA: SCAQMD Rule 403 – Fugitive Dust: The Project Plans and specifications shall implement compliance with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403 as implemented by the City's standard Condition of Approval, which includes dust minimization measures, the use of electricity from power poles rather than diesel or gasoline powered generators, and the use of methanol, natural gas, propane or butane vehicles instead of gasoline or diesel powered equipment, where feasible.

SCAQMD Rule 1113 – Architectural Coatings: The Project plans and specifications shall implement compliance 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 Volatile Organic Compound) and/or High Pressure Low Volume (HPLV) applications shall be used.

Mitigation Measures

No mitigation measures related to air quality are required.

References

AQMD Attainment Status for South Coast Air Basin. Accessed at: http://www.aqmd.gov/home/air-quality/clean-air-plans

AQMD Rule 402. Nuisance. Accessed at: www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

Air Quality, Energy, and Greenhouse Gas Impact Analysis, prepared by EPD Solutions, Inc., Appendix A

California Air Resources Board (CARB 2026). Overview: Diesel Exhaust & Health Accessed at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

Level of Service (LOS) Analysis Screening Memo, prepared by EPD Solutions, Inc., Appendix B.

South Coast AQMD Final 2022 AQMP. Accessed at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

South Coast Air Quality Management District Final Localized Significance Threshold Methodology (SCAQMD 2008). Accessed: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

Southern California Association of Governments Regional Housing Needs Assessment 2021-2029. Accessed: https://scag.ca.gov/rhna

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US 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?	☐	☐	☐	☒

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?

No Impact. The Project site is developed with buildings that are surrounded by paved surfaces and small areas of ornamental landscaping that includes grass lawn, trees, and shrubs. The Project site is located within an urbanized area that is surrounded by buildings, fencing, and roadways. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife

Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on the site.

The Project would redevelop the site and provide new landscaping that would include a variety of ornamental trees, shrubs, and groundcover. As no sensitive species or habitats are located within the site or surrounding urban and developed areas, implementation of the Project would not result in an adverse effect, either directly or through habitat modifications, on any sensitive species, and significant impacts would not occur. No mitigation measures are required.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. Riparian habitats occur along the banks of rivers, streams, or wetland areas. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies or are known to provide habitat for sensitive animal or plant species. As described in the previous response, the Project site is within an urban area, largely developed, and does not contain any sensitive natural habitats, including riparian habitat or sensitive natural community. Additionally, the Project site is bound by developed areas that include buildings, pavement, roadways, fencing, and interspersed areas of ornamental landscaping that do not contain sensitive natural habitat areas. No riparian habitat or other sensitive natural communities occur adjacent to the Project site. Additionally, the Project site and adjacent areas are not included in any local or regional plans, policies, and regulations that identify riparian habitat or other sensitive natural community. Thus, no impacts related to riparian habitat or other sensitive natural communities identified in local or regional plans would result from Project implementation, and no mitigation would be required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The Project site and adjacent areas are located within a developed urban area and do not contain natural wetlands. Therefore, the Project would not result in impacts to wetlands. No mitigation measures are required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. 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, provide avenues for wildlife dispersal, migration, and contact between other populations. The Project site is not located within a designated wildlife corridor or linkage. The Project site is within a developed area and does not provide function for wildlife movement. The site is surrounded by roadways on two sides and residential, church, and school development separated by a fence and a wall on the other two sides. Also, there are no rivers, creeks, or open drainages

near the site that could function as a wildlife corridor. Thus, implementation of the Project would not result in impacts related to wildlife movement or wildlife corridors.

The Project site contains scattered ornamental trees that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515 during the avian nesting and breeding season. The provisions of the MBTA prohibit disturbing or destroying active nests. All development in the City is required to comply with established laws and regulations regarding the protection of migratory or sensitive wildlife (e.g., migratory bird treaty act) that would be implemented through the City's standard Condition of Approval. Therefore, no significant impacts to wildlife nursery sites would occur from implementation of the proposed Project, and no mitigation measures are required.

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

No Impact. There are no local biological related policies or ordinances, such as a tree preservation policy or ordinance that is applicable to the Project. Trees in the public right-of-way in the City are protected under Chapter 11.32 of the GGMC, which regulates the planting, maintenance, and removal of trees in public locations in the City. The Project site contains scattered ornamental trees that are on private property and not subject to the City ordinance. Any street trees that would be planted, moved, or replaced within the Russell Avenue or Kerry Street right-of-way as part of the Project would comply with the removal, moving, and planting regulations included Chapter 11.32 of the GGMC that would be verified through the City's development permitting process. Therefore, implementation of the Project would not conflict with local policies or ordinances protecting trees and no impact would occur. No mitigation measures are required.

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

No Impact. The Project site is within a developed and urban area. The Project site does not contain any natural lands that are subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, implementation of the proposed 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. No impact would occur, and no mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulation and City Condition of Approval would reduce potential impacts related to biological resources.

COA: Migratory Bird Treaty Act and California Fish and Game Code Sections 3503.5, 3511, and 3515: The Project construction COA plans and specifications shall identify compliance with the following City standard Condition of Approval. The applicant shall comply with the Migratory Bird Treaty Act (MBTA), and Sections 3503, 3503.5, and 3515 of the California Fish and Game regulations, which require the protection of active nests of all bird species, prior to the removal of any on-site landscaping, including the removal of existing trees.

Prior to commencement of grading activities and issuance of any building permits, the City Community Development Director, or designee, shall verify that all Project grading and construction plans are consistent with the requirements of the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503.5, 3511, and 3515, as stated above, that pre-construction surveys have been completed (if needed) and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field with orange snow fencing.

Mitigation Measure

No mitigation measures related to biological resources are required.

References

California Department of Fish and Wildlife. 2020. California Natural Diversity Database (CNDDB), Whittier 7.5-minute Quadrangle. Accessed at: https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Focused General Plan Update and Zoning Amendments Draft Environmental Impact Report (SCH# 2021060714), 2021. Accessed: https://ceqanet.opr.ca.gov/Project/2021060714

City of Garden Grove Municipal Code. Accessed at: https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

United States Fish and Wildlife Service (USFWS). National Wetlands Inventory. Accessed: https://www.fws.gov/wetlands/data/mapper.html

U.S. Fish and Wildlife Service Migratory Bird Treaty Act. Accessed at: https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 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 formal cemeteries?	☐	☐	☒	☐

The discussion below is based on the Cultural Resources Study for the 9822 Russell Avenue Project, included as Appendix C, the Preliminary Geotechnical Investigation Report, which is included as Appendix D, and the Phase I Environmental Site Assessment, included as Appendix E.

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less than Significant Impact. The Project site does not contain any CEQA historical resources. CEQA defines a historical resource as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR); (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and CEQA Guidelines Section 15064.5[a]).

The California Register defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values; or (4) has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The Project site is currently developed with three structures utilized for church, preschool, and daycare uses. City building permits identify that the original church structures on site were developed in 1957, 1961, and 1965, which included remodeling of the original 1957 structure. Between 1972 and 1987, a breezeway was constructed connecting the east façade of the northernmost building to the west façade of the easternmost building. Then in 1981 the 2,875 square foot one-story building was converted and remodeled for use as a school facility. It was noted in the 1981 Conditional Use Permit (CUP) for the conversion that there is no kitchen

facility (such as one that currently exists). Building permits records also identify building alterations in 1980, 1983, a new roof in 1989, roof alterations in 2003, new wrought iron fencing in 2011, and an unmanned wireless communications antennae installed in the church steeple in 2001 that is currently inoperable. Thus, the existing buildings on the site have been modified since the original construction and have lost the original integrity. Although the existing buildings were constructed over 50 years ago, which is of historic era (50 years of age or greater), the buildings are older modern structures with modern signage on the buildings, light fixtures, windows, doors, air conditioning units, roof mounted ventilation systems, and shingled roofs with modern fencing and surface parking lots.

The buildings on the Project site have been used by various churches and preschools since development, with interior improvements provided through the years. The site buildings are currently occupied by Iglesia de Cristo de Restauracion and Orangefield Child Development Center. The history of different churches and schools on the site is listed in Table CUL-1.

Table CUL-1: History of Site Occupants

Year	Site Occupants
1955	Garden Grove Church of Christ
1958	Garden Grove Church of Christ
1964	Church of Christ
1967	Church of Christ
1970	Church of Christ Christian
1975	Church of Christ
1981	Garden Grove Church of God
1986	Cornerstone Christian/Garden Grove Christian Church
1991	Bethel Missionary Church, Cornerstone Christian/Garden Grove Christian Church
1996	Cornerstone Christian/Garden Grove Christian Church
2001	Cornerstone Christian, Cross County Vietnamese Christian Church
2003	Bethel Missionary Church, Cross County Vietnamese Christian Church
2008	Iglesia de Cristo de Restauracion
2012	Sunflower Preschool
2016	Sunflower Preschool, Development Center Orange, Iglesia de Cristo de Restauracion
2020	Sunflower Preschool, Development Center Orange, Iglesia de Cristo de Restauracion
2023	Sunflower Preschool, Development Center Orange, Iglesia de Cristo de Restauracion
2024	Sunflower Preschool, Development Center Orange, Iglesia de Cristo de Restauracion

Source: Phase I ESA, Appendix E

As part of the Cultural Resources Study for the Project a records search of the site and a one-mile radius was completed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, which identified that the buildings on the Project site were previously evaluated in 2014 and determined not to be eligible for the National Register of Historic Places (NRHP). In 2014 it was noted that the property was not associated with any historic events or significant persons and does not reflect a notable example of a particular architectural style or the workmanship of a specific architect or craftsman (Appendix C).

In addition, the Cultural Resources Study (Appendix C) determined that none of the structures associated with Project site embody the distinctive characteristics of a type, period, region, or method of construction, represent the work of an important creative individual, or possess high artistic values. Further, additions and modifications to the buildings have reduced the buildings' integrity of design and materials. As such, the Project site buildings are not significant or eligible for the CRHR (Appendix C). The many churches and preschool/daycare facilities

that have operated on the site are not unique to Garden Grove or the region; and these church and school buildings are not associated with events, persons, or architecture that would meet the California Register criteria of a historic resource. Therefore, impacts related to historic resources would not occur from demolition of the existing buildings.

The adjacent Sunnyside Elementary school buildings consist of typical elementary school structures that are adjacent to school parking, playgrounds, open space, and portable classrooms. The school does not consist of a historic resource. In addition, the residential structures that are to the north of Russell Avenue, to the west of Kerry Street, and adjacent to the south of the site are modern residential structures with shingle roofs and windows with a variety of architectural styles and separated by fencing and do not consist of documented historic resources.

As the Project site does not contain and is not adjacent to any historic resources, redevelopment of the site with new residential townhomes would not result in impacts to CEQA historic resources. Thus, impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact.

Construction
The Project site has been disturbed by previous activities. Review of historic aerial photographs of the Project site and surrounding area show that the site was used for agricultural land from 1938 through 1953; and then development of church structures began in 1955. As explained in the Preliminary Geotechnical Investigation Report (Appendix D), soils beneath the Project site consist of approximately two feet of compacted artificial fill, but thicker deposits of fill are expected to be under existing building pads. The Project involves grading and excavation of the upper two feet (or one foot below footings) of soil that would be removed and recompacted. Thus, Project excavation would not be likely to encroach into non-fill soils.

The Cultural Resources Study (Appendix C) records search performed at the SCCIC at California State University, Fullerton indicated that no prehistoric resources have ever been identified within the vicinity of the Project. Additionally, the Cultural Resources Study determined that the disturbed nature of the site as a result of previous development, clearing, and grading, coupled with the records search results, indicates that there is little to no potential for any significant archaeological deposits to be present within the Project boundaries. Therefore, potential impacts to archaeological resources would be less than significant. No mitigation would be required. However, the City has a standard Condition of Approval related to archaeological resources that is included in the case that any potential resources are found during Project construction.

Operation
At the completion of Project construction, the proposed residences would not result in further disturbance of native soils on the site. Therefore, operation of the Project would not result in a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines. No mitigation would be required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The Project site has been extensively disturbed, as described above, and has not been previously used as a cemetery. Thus, potential impacts related to human remains are less than

significant. However, in the unanticipated event that human remains are found during Project construction activities compliance with California Health and Safety Code Section 7050.5 will be required. As specified by California Health and Safety Code Section 7050.5, if human remains are found on the Project site, the County Coroner's office shall be immediately notified and no further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will make a determination as to the Most Likely Descendent. Compliance with the existing California Health and Safety Code regulations will ensure impacts related to potential disturbance of human remains are less than significant. No mitigation would be required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulation and City Condition of Approval would reduce potential impacts related to cultural resources.

COA: Archaeological Resources. The Project construction plans and specifications shall identify compliance with the following City standard Condition of Approval. During construction, if archaeological resources are found, all attempts will be made to preserve in place or leave in an undisturbed state in compliance with applicable law. In the event that cultural resources are encountered on the site during construction and cannot be preserved in place, the applicant shall contact and retain, at applicant's expense, a qualified archaeologist, acceptable to the City to evaluate and determine appropriate treatment for the specimen or resource, and work in the vicinity of the discovery shall halt until appropriate assessment and treatment of the resource is determined by the archeologist (work can continue elsewhere on the Project site). Any mitigation, monitoring, collection, and specimen/resource treatment measures recommended by the archaeologist shall be implemented by the applicant at its own cost.

Human Remains: In the event that human remains are encountered on the Project site, work within 50 feet 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 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.

Mitigation Measures

No mitigation measures related to energy are required.

References

California State Parks Office of Historic Preservation. California Register of Historical Resources. https://ohp.parks.ca.gov/ListedResources/

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Focused General Plan Update and Zoning Amendments Draft Environmental Impact Report (SCH# 2021060714), 2021. Accessed: https://ceqanet.opr.ca.gov/Project/2021060714

Cultural Resources Study for the 9822 Russell Avenue Project, 2025. Prepared by BFSA Environmental Services. (Appendix C)

National Park Service. National Register of Historic Places
https://www.nps.gov/subjects/nationalregister/database-research.htm

Phase I Environmental Site Assessment, prepared by Partner Engineering and Science, Inc, 2025 (Appendix E).

Preliminary Geotechnical Investigation Report, 2025. Prepared by Alubs & Associates, Inc. (Appendix D).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. Would the project:				
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, included as Appendix A.

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

Less Than Significant Impact. As the Project site is developed with a church, preschool and daycare and the site is connected to the existing utility infrastructure, which includes electrical and natural gas services. The Southern California Gas Company currently provides natural gas to the Project site and surrounding area. Additionally, Southern California Edison currently provides electricity services to the Project site and surrounding area. The proposed Project would not utilize natural gas and would install new onsite electrical infrastructure that would connect to the existing offsite lines.

Construction

Construction of the proposed Project would remove the existing site improvements and landscaping and redevelop the site with 26 new townhome residences, recreation and open space areas, landscaping, and parking facilities. During construction, energy would be consumed in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as 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.

Based on these uses of energy during construction activities, the proposed buildings and the associated infrastructure would not be expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Construction of the Project would not involve any unusual or increased need for energy. In addition, the extent of construction activities that would occur is limited to a total of 11 months (as listed previously in Table 2, Construction Schedule), and the demand for construction-related electricity and fuels would be limited to that time frame.

As shown in Table E-1, construction of the proposed Project would require a total of 25,810 gallons of diesel fuel and 6,369 gallons of gasoline fuel from construction vehicles. This would result in a <0.01 percent increase in both countywide construction diesel fuel consumption and countywide on-road gasoline consumption. Thus, increased energy consumption from the construction of the proposed Project would be nominal. Additionally, it should be noted that this total fuel consumption is a conservative analysis and would likely overstate the amount of fuel usage, as specific construction equipment (e.g., crane) is not expected to operate during the entire duration of the construction activity.

Table E-1: Estimated Construction Equipment Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	2,342	6,369
Off-Road Construction Equipment	23,468	-
Total	**25,810**	**6,369**
Orange Countywide Consumption	148,356,352	863,917,364
Percentage Increase (%)	<0.01%	<0.01%

Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

Construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment as part of the City's construction permitting process to ensure that equipment would not use fuel inefficiently. In addition, CARB regulations and CCR Title 13, Motor Vehicles, section 2449(d)(3) limits idling times of construction vehicles to no more than 5 minutes, which avoids unnecessary and wasteful consumption of fuel due to idling of construction equipment. Because Project construction activities would comply with these existing regulations, as ensured through the City's permitting process, it would not use fuel in a wasteful, inefficient, and unnecessary manner. Thus, no impacts related to wasteful, inefficient, or unnecessary construction energy usage would occur, and no mitigation measures are required.

Operation

Once operational, the Project would generate demand for electricity and gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of the residences, water heating, operation of electrical systems and plug-in appliances, and outdoor lighting, and the transport of electricity and water to the residences where they would be consumed. This use of energy is typical for urban development, no additional energy infrastructure would be required to be built to operate the Project, and no operational activities would occur that would result in extraordinary energy consumption.

As detailed in Table E-2, operation of the proposed Project is estimated to result in the annual use of approximately 106,474.3 kilowatt-hour (kWh) of electricity, which is approximately 61,076.91 kWh less than the existing church, preschool, and daycare uses. Also, the Project is estimated to use 24,208.6 gallons of gasoline annually, which is 13,061.9 gallons less annually than the existing church, preschool, and daycare uses. Further, operation of the proposed Project would account for less than 0.01 percent of countywide electricity consumption and less than 0.01 percent of countywide gasoline consumption.

Table E-2: Estimated Annual Operational Energy Consumption

Operational Source	Project Energy Usage	Orange Countywide Energy Consumption	Project Percentage
Electricity (Kilowatt-Hour)			
Proposed Project	106,474.3	18,759,000,000	<0.01%
Existing Use	167,551.2		
Net Electricity	- 61,076.91		
Gallons of Gasoline Fuel			
Proposed Project	24,208.6	863,917,364	<0.01%
Existing Use	37,270.5		
Net Petroleum (Gasoline)	- 13,061.9		

Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

The proposed Project would be required to meet the current Title 24 energy efficiency standards, as included in GGMC Section 18.04.010. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include solar panels, insulation; use of energy-efficient heating, ventilation, and air conditioning (HVAC) equipment; solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; and incorporation of skylights, etc. 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. Thus, operation of the Project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur. No mitigation measures are required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed Project would be required to meet the CALGreen energy efficiency standards in effect during permitting of the Project, which are included in the GGMC as Section 18.04.010. The City's administration of the requirements includes review of design components and energy conservation measures during the permitting process, which ensures that all requirements are met. In addition, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy, which would be included on the residential rooftops as required by the existing Title 24/CALGreen standards. As such, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations would reduce potential impacts related to energy.

CALGreen Compliance: The Project plans and specifications shall implement compliance with the CALGreen Building Code as included in the City's GGMC Section 18.04.010 to ensure efficient use of energy. CALGreen specifications are required to be incorporated into building plans as a condition of building permit approval.

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3): The Project construction plans and specifications shall implement compliance with CCR Title 13, Motor Vehicles, Section 2449(d)(3), which states that no vehicle or engines may idle for more than 5 consecutive minutes. The idling

limit does not apply to queuing and necessary operation to accomplish work for which the vehicle/equipment was designed.

Mitigation Measures

No mitigation measures related to energy are required.

References

Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A), prepared by EPD Solutions, 2026.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
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 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 Preliminary Geotechnical Investigation Report, which is included as Appendix D and the Paleontological Assessment, included in Appendix F, that were completed for the Project.

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?

No Impact. The Project site is not located within a designated Alquist-Priolo Earthquake Fault Zone. As described by the Preliminary Geotechnical Investigation Report prepared for the Project (Appendix D), there are no known active faults traversing the site. The closest active fault is the San Joaquin Hills Fault that is located 5.22 miles from the Project site. 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. No mitigation measures are required.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii. Strong seismic ground shaking?

Less than Significant Impact. As with all of Southern California, the Project site is subject to strong ground motion resulting from earthquakes on nearby faults. The principal seismic hazard that could affect the site is ground shaking resulting from an earthquake occurring along several major active or potentially active faults in Southern California. As described in the previous response, the closest active fault is the San Joaquin Hills Fault that is approximately 5.22 miles from the Project site (Appendix D). Movement along this fault, or other regional faults could result in seismic ground shaking on the Project site. The amount of motion expected at the Project site can vary from none to forceful depending upon the distance to the fault and the magnitude of the earthquake. Greater movement can be expected at sites located closer to an earthquake epicenter.

However, 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]), as included in the GGMC in Title 18 Building Codes and Regulations, which regulates all building and construction projects within the City and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. The Preliminary Geotechnical Investigation Report (Appendix D), which is required pursuant to CBC regulations, prepared for the Project provides CBC seismic structural design criteria that are specific to the onsite soils and potential seismic ground shaking that includes: excavation, re-compaction, and foundation systems. Project compliance with the requirements outlined in the Preliminary Geotechnical Investigation Report shall be a condition for Project approval. Because the Project would be required to be constructed in compliance with the CBC and the GGMC, which would be verified through the City's plan check and permitting process, the Project would result in a less than significant impact related to strong seismic ground shaking. No mitigation measures are required.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires

"mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

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. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

The onsite borings identified groundwater as high as 14 feet below the ground surface and the Preliminary Geotechnical Investigation Report included an analysis of the potential effects related to liquefaction, which identified that the presence of layers of sands with silt, sandy silts, silty sands / sandy silts, and silty sands that are onsite that would be prone to liquefaction and onsite settlement of soils that could affect the proposed structures. In order to reduce the potential liquefaction related settlement, the Preliminary Geotechnical Investigation Report states that Project construction should include removal and re-compaction of the upper 12-inches of site soils and use of well-reinforced foundations, such as post-tensioned slabs, grade beams with structural slabs, or mat foundations, in compliance with the CBC, which would reduce the potential of liquefaction related settlement to a less than significant level. The Project would be required to be constructed in compliance with the CBC, the GGMC, and the recommendations of the Preliminary Geotechnical Investigation Report, which would be verified through the City's plan check and permitting process and is a standard City Condition of Approval. Thus, the Project would be required to implement re-compaction of soils and foundation systems in compliance with the CBC, and potential impacts related to liquefaction would be reduced to a less than significant level. No mitigation measures are required.

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv. Landslides?

No Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after 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 Project site is located in a flat developed urban area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. As a result, implementation of the Project would not expose people or structures to substantial adverse effects involving landslides, and impacts related to landslides would not occur. No mitigation measures are required.

b) Result in soil erosion or the loss of topsoil?

Less than Significant Impact. The Project site is largely impervious, as it is generally covered by pavement or the existing buildings. However, small areas of landscaping between the existing buildings, adjacent to the front parking area, along Kerry Street, and along the Russell Avenue frontage. During construction, the Project would redevelop the site for townhome residential uses, which would include areas of landscaping that would surround the proposed structures and be located along the site boundary, which would cover loose soils and reduce potential for soil erosion.

In addition, Section 6.40.050 of the GGMC states that all new development and significant reconstruction within the City, such as the Project, shall be undertaken in accordance with the County Drainage Area Management Plan (DAMP). The DAMP requires that construction sites implement control practices that address erosion and sedimentation (DAMP Section 8.0). Additionally, the Statewide National Pollutant Discharge Elimination

System (NPDES) Permit for General Construction Activity requires implementation of a Storm Water Pollution Prevention Plan (SWPPP), by a Qualified SWPPP Developer. The SWPPP is required to be consistent with the County DAMP, address site-specific conditions related to sources of sediment, and implement erosion control and sediment control BMPs to reduce or eliminate sediment during construction. Adherence to a City approved SWPPP, which would be verified prior to the issuance of a demolition or grading permit would ensure that potential erosion associated with construction activities would be minimized, and impacts would be less than significant.

After construction is completed, the Project site would consist of new paved areas and landscaping and would not include substantial areas of loose topsoil that could result in soil erosion or the loss of topsoil. Also, operation of the proposed Project would be required to comply with the requirements of the County DAMP that requires a Water Quality Management Plan (WQMP) that includes Low Impact Development (LID) features and BMPs to limit the potential for erosion during storm water runoff. The Project's WQMP would be reviewed and approved by the City prior to the issuance of a building permit to ensure it complies with the DAMP regulations, which would ensure that operation of the proposed Project would not result in soil erosion or loss of topsoil. With implementation of existing regulations, impacts would be less than significant, and no mitigation measures are required.

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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impact. As described above, the Project site is flat and does not contain nor is adjacent to any slope or hillside area. The Project would not create slopes. Thus, on or offsite landslides would not occur from implementation of the Project. Also, as previously described, potential effects related to liquefaction would be avoided by removal and re-compaction of the upper 12-inches of the site soils and use of well-reinforced foundations, such as post-tensioned slabs, grade beams with structural slabs, or mat foundations in compliance with the CBC. Thus, impacts related to liquefaction would be less than significant.

Lateral spreading, a phenomenon associated with seismically induced soil liquefaction, is a display of lateral displacement of soils due to inertial motion and lack of lateral support during or post liquefaction. It is typically exemplified by the formation of vertical cracks on the surface of liquefied soils, and usually takes place on gently sloping ground or level ground with nearby free surface such as drainage or stream channel. As described previously, the Preliminary Geotechnical Investigation Report (Appendix D) states that onsite soils consist of layers of sands with silt, sandy silts, silty sands / sandy silts, and silty sands, and that groundwater is 14 feet below the ground surface. As a result, the site could be subject to seismic related lateral spreading. Also, as described previously, the Preliminary Geotechnical Investigation Report states that Project construction should include removal and re-compaction of the upper 12-inches of the site soils and use of well-reinforced foundations, such as post-tensioned slabs, grade beams with structural slabs, or mat foundations in compliance with the CBC. The City's development permitting process requires specific CBC compliant 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 effects related to ground movement, including lateral spreading. Thus, impacts would be less than significant with respect to lateral spreading, and no mitigation measures are required.

Soils collapse could occur if buildings or other improvements are built on low-strength foundation materials (including imported fill) or if improvements straddle the boundary between different types of subsurface materials (e.g., a boundary between native material and fill). Soils susceptible to seismically induced collapse

typically include dry loose sands. As described previously, the Preliminary Geotechnical Investigation Report (Appendix D) testing results indicate that removal and re-compaction of the upper 12-inches of the site soils and use of well-reinforced foundations, such as post-tensioned slabs, grade beams with structural slabs, or mat foundations in compliance with the CBC would stabilize soils and provide a solid building foundation. Thus, compliance with the CBC and the recommendations of the Preliminary Geotechnical Investigation Report, as ensured through the City's development permitting process, would reduce potential impacts to a less than significant level, and no mitigation measures are required.

d) Be located on expansive soil, as defined in in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience, such as Southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture. As described above, the Project site soil consists of layers of sands with silt, sandy silts, silty sands / sandy silts, and silty sands, which were evaluated by the Preliminary Geotechnical Investigation Report (Appendix D) and determined to have a very low expansion potential.

In addition, as described in the previous response, the Project would be required to be constructed in compliance with the CBC, the GGMC, and a site-specific geotechnical evaluation pursuant to specific engineering standards to provide the appropriate back fill, compaction of soils, and foundation design to ensure stable soils, which would be verified through the City's permitting process. Thus, impacts related to expansive soils would be less than significant. No mitigation measures are required.

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?

No Impact. The Project does not include construction of septic tanks or connections to septic systems or alternative wastewater disposal systems. The Project site is currently connected to the City's sewer system, and the Project would also connect to existing sewers and would not use septic tanks or alternative wastewater disposal systems. As a result, impacts related to septic tanks or alternative wastewater disposal systems would not occur from implementation of the Project. No mitigation measures are required.

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

Less than Significant with Mitigation Incorporated

Construction

As explained in the Preliminary Geotechnical Investigation Report, soils beneath the Project site consist of approximately two feet of compacted artificial fill, but locally thicker deposits of fill were anticipated under existing building pads. Alluvium underlying the fill extended to the maximum depth explored of 51 feet and generally consisted of silty sands to a depth of approximately 10 feet, in turn overlying sandy silts and sands with various amounts of silt.

In preparation for the Paleontological Assessment for the Project (included as Appendix F), a paleontological collections and locality records search was conducted by the Natural History Museum of Los Angeles County (LACM) that did not identify any known fossil localities within several miles of the Project. Also, a search of the

online paleontological database maintained by the San Diego Natural History Museum (SDNHM) was performed, which identified the closest fossil locality to the Project held by that institution is from Pleistocene-aged deposits in Anaheim, between three and four miles to the northeast of the Project. In addition, the Paleontological Assessment determined that the alluvium mapped at the Project has a low potential to contain paleontological resources.

The Project involves grading and excavation of the upper two feet or one foot below footings of soil that would be removed and recompacted. The Paleontological Assessment (Appendix F) determined that based upon the moderate density of the alluvial strata indicated in the geotechnical boring logs and the shallow Project grading depths, the Project would not likely encounter potentially paleontologically sensitive Pleistocene alluvium. However, Mitigation Measure PAL-1 has been included to provide procedures to be followed in the unlikely event that potential paleontological resources are discovered during grading or excavation activities. Mitigation Measure PAL-1 requires that work shall cease within 50 feet of a find until a qualified paleontologist has evaluated the find in accordance with federal and state regulations. Mitigation Measure PAL-1 would reduce potential impacts to undiscovered archaeological resources to a less than significant level.

Operation
At the completion of Project construction, the proposed residential townhomes would not result in further disturbance of native soils on the Project site. Therefore, operation of the Project would not result in a substantial adverse change in the significance of a unique paleontological resource or site or unique geologic feature. No mitigation would be required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations and City Condition of Approval would reduce potential impacts related to geology and soils.

COA: California Building Code: The Project plans and specifications shall comply with City standard Conditions of Approval for the California Building Code (CBC) and implement compliance with the CBC as included in GGMC Title 18, Building Codes and Regulations. All work shall comply with the latest edition of the California CBC at time of permit application 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 and building plans and specifications prior to issuance of grading and building permits.

SWPPP: Prior to grading permit issuance, the Project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a QSD (Qualified SWPPP Developer) in accordance with the County Drainage Area Management Plan (DAMP). The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other DAMP requirements to comply with the National Pollutant Discharge Elimination System (NPDES) regulations to limit the potential of polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City of Garden Grove staff or its designee to confirm compliance.

Water Quality Management Plan: Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City Building and Safety Division. The WQMP shall identify all post-construction, site design, source control, and treatment control Best Management Practices (BMPs) that will be incorporated into the development project in order to

minimize the adverse effects on receiving waters. The WQMP shall comply with GGMC Section 6.40.050, the Orange County DAMP, and the Santa Ana Region, Regional Water Quality Control Board (RWQCB) requirements in effect at the time permitting.

Mitigation Measures

Mitigation Measure PAL-1: Paleontological Resources. Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified professional paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to issuance of grading permits, the City shall verify that all Project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources.

After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the Community Development Director, or designee, and the Natural History Museum of Los Angeles County.

References

U.S. Geological Survey U.S. Quaternary Fault Mapping. Accessed: https://usgs.maps.arcgis.com/

City of Garden Grove Municipal Code. Accessed: https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

Orange County Drainage Area Management Plan. Accessed: http://www.ocwatersheds.com/documents/damp

Paleontological Assessment for the 9822 Russell Avenue Project, 2025 (Appendix F).

Preliminary Geotechnical Investigation Report, 2025. Prepared by Alubs & Associates, Inc. (Appendix D).

Society of Vertebrate Paleontology. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Accessed: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
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, which is included as Appendix A.

GHG Thresholds

Global climate change describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas (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.

The principal GHGs of concern contributing to the greenhouse effect are CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). GHGs are produced by both direct and indirect emissions sources. Direct emissions include 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. The large majority of GHG emissions generated from residential projects are related to vehicle trips.

The SCAQMD has proposed interim numeric GHG significance thresholds that are based on capture of approximately 90 percent (90%) of emissions from residential or commercial development, which is 3,000 metric tons carbon dioxide equivalent ($MTCO_2e$) per year (SCAQMD 2008). In 2008 the SCAQMD used the Executive Order S-3-05 year 2050 goal as the basis for the 3,000 metric ton threshold. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 parts per million (ppm), thus stabilizing global climate. Therefore, for purposes of examining potential GHG impacts from implementation of the proposed Project, the threshold of 3,000 $MTCO_2e$ is utilized herein to determine if GHG emissions from this Project would be significant.

Also, SCAQMD methodology to calculate a project's GHG construction emissions is to average them over 30-years and then add them to the project's operational emissions to determine if the project would exceed the 3,000 metric ton threshold. This approach is widely used by cities in the South Coast Air Basin, including the City of Garden Grove.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact

Construction

During construction, temporary sources of GHG emissions include use of heavy-duty construction equipment onsite, use of construction vehicles, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O.

The proposed Project would remove the existing church, preschool, daycare, related improvements, pavement, infrastructure, and landscaping on the site and redevelop the site with 26 new townhome residences. As shown on Table GHG-1, the Project is estimated by CalEEMod to generate a total of approximately 12 $MTCO_2e$ per year from construction emissions when amortized over 30 years per SCAQMD methodology.

Table GHG-1: Construction Greenhouse Gas Emissions (metric tons per year)

Activity	Annual GHG Emissions ($MTCO_2e$)
2027	155
2028	197
Total Emissions	**352**
Total Emissions Amortized Over 30 Years	12

Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

Operation

Operation of the proposed 26 residential townhomes uses would result in GHG emissions from vehicle trips, electricity consumption, water transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the residences would be generated offsite 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. However, as detailed in Section 17, *Transportation*, the proposed 26 residential townhomes would result in 58 fewer daily trips than the existing church, preschool and daycare uses, which would provide a reduction in vehicular GHG emissions.

As shown in Table GHG-2, the proposed Project would result in 222 $MTCO_2e$ operational emissions, plus 12 $MTCO_2e$ amortized construction emissions to result in a total of 234 $MTCO_2e$, which is below the 3,000 $MTCO_2e$ threshold. When compared to emissions from operation of the existing church, preschool, and daycare buildings, including the reduction in 58 daily vehicle trips, the Project would result in a net decrease of 180 $MTCO_2e$ per year. Thus, impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

Table GHG-2: Total Project Generated Greenhouse Gas Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)*
Mobile	195
Area	<0.01
Energy	18
Water	3
Waste	6
Refrigeration	<0.01
Total Project Operation Emissions	**222**
Amortized Construction Emissions	12
Total Project Emissions	**234**
Existing Emissions	414
Net New Emissions	**-180**
Significance Threshold	3,000
Threshold Exceeded?	**No**

Source: AQ, Energy, and GHG Impact Analysis, Appendix A.

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

No Impact. The proposed Project would redevelop the site with 26 residential townhomes that would comply with state programs that are designed to be energy efficient. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As described in the previous response, the Project would not exceed the GHG emissions threshold that is based on the Executive Order S-3-05 year 2050 goal and would reduce GHG emissions in comparison to operation of the existing use. In addition, the Project would comply with regulations imposed by the state and the SCAQMD that reduce GHG emissions, as described below:

- Global Warming Solutions Act of 2006 (AB 32) is applicable to the project because many of the GHG reduction measures outlined in AB 32 (e.g., low carbon fuel standard, advanced clean car standards, and cap-and-trade) have been adopted and implementation activities are ongoing. The advanced clean car standards are regulations for car manufacturers; and cap-and-trade refers to a policy tool where emissions from a certain region or sector (e.g., electricity generation, petroleum refining, cement production) are limited to a certain amount and emissions reductions can be traded ultimately providing flexibility on how the emitter can comply. The project would redevelop the project site for new residential townhomes that would not conflict with automobile fuel regulations, car standards, or cap-and-trade. The project would include solar panels and electric vehicle plug in facilities as required by CALGreen/Title 24 regulations that are included in the GGMC as Section 18.04.010.
- Title 24 California Code of Regulations (Title 24) establishes energy efficiency requirements for new construction that address the energy efficiency of new (and altered) residences and related infrastructure, appliances, irrigation. Title 24 is included in the GGMC as Section 18.04.010, which would provide efficient energy and water consumption. The City's administration of the requirements includes review of the energy conservation measures during the permitting process, which ensures that all requirements are met.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard [LCFS]) requires low carbon content of fuel sold in California. Because the LCFS applies to any transportation fuel that is sold or

supplied in California, all vehicles trips generated by the project within the state would comply with LCFS.

- California Water Conservation in Landscaping Act of 2006 (AB 1881) provides requirements to ensure water efficient landscapes in new development and reduced water waste in existing landscapes. The project is required to comply with AB 1881 landscaping requirements (included in the GGMC in Section 9.12.040.085 and pursuant to the Title 24 regulations in GGMC Section 18.04.010), which the City includes as a Condition of Approval and would be verified by the City during the project permitting process.

2022 CARB Scoping Plan

The 2022 CARB Scoping Plan Update sets the GHG emission reduction target for 2045 at 85 percent below 1990 levels. Table GHG-3 lists all GHG reduction policies applicable to residential developments. The following table also includes policies from Appendix D of the Scoping Plan, which provide GHG reduction policies for local governments to implement. The local action policies are focused on climate action planning and approval of new land use development projects. As shown below, the proposed Project would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs within the 2022 Scoping Plan.

Table GHG-3: 2022 Scoping Plan Consistency Summary

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	**Consistent.** The Project would comply with Title 24, Part 6 building energy requirements along with other local and State initiatives that aim to achieve the 40 percent below 1990 levels by 2030 goal. Also, as detailed previously, the Project would generate a total of 234 MTCO2e, which is far below the 3,000 MTCO2e threshold; and compared to emissions from operation of the existing church, preschool, and daycare buildings, the Project would result in a net decrease of 180 $MTCO_2e$ per year. Thus, the Project is consistent.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Consistent.** As detailed in Section 17, *Transportation*, the Project would result in a reduction of 58 trips per day, which would reduce VMT compared to the existing uses on the Project site.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	**Consistent.** The proposed Project would be designed and constructed in accordance with Title 24 Part 6 and Part 11 requirements, which includes constructing homes to allow for electric vehicle charging.
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 comply with Title 24, Part 6 building energy requirements, which would require all in-unit appliances for residential projects to be all-electric and Energy Star certified.

Action	Consistency
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	**Consistent.** The proposed 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.
Transportation Electrification	
Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as permit streamlining, infrastructure siting, consumer education, or preferential parking policies).	**Consistent.** The proposed Project would be designed and constructed in accordance with Title 24 Part 6 and Part 11 requirements, which includes constructing homes to allow for electric vehicle charging. Therefore, the proposed Project would not interfere with the implementation of a ZEV ecosystem within the City.
Local Action Policies - VMT Reduction	
Increase public access to shared clean mobility options (such as planning for and investing in electric shuttles, bike share, car share, transit).	**Consistent.** The Project site is located in a developed urban area. Sidewalks would be provided throughout the site and would connect to existing sidewalks along Russell Avenue and a new sidewalk along Kerry Street that would be installed by the Project. The Project also includes bicycle rack for short-term bike parking. In addition, the proposed residential units would allow for charging of electric vehicles. The nearest bus stop is provided along Brookhurst Street, approximately 600 feet to the east of the site) by OCTA Bus Route 35 with service every 30 minutes during the peak hour.
Amend zoning or development codes to enable mixed-use, walkable, and compact infill development (such as increasing allowable density of the neighborhood).	**Consistent.** The proposed Project proposes a General Plan Amendment to change the land use designation from LDR to LMDR, and a Zone Change to change the designation from R1 to PUD with an R2 base zone. These changes would allow for the development of a compact residential community on an underutilized parcel within a walkable portion the City. The Project includes sidewalks throughout the site that would connect to existing sidewalks along Russell Avenue and a new sidewalk along Kerry Street that would be installed by the Project.
Local Action Policies - Building Decarbonization	
Adopt all-electric new construction reach codes.	**Consistent**. The proposed Project would comply with Title 24 Parts 6 and 11, which includes electric heat pumps installed during construction and electric hookups for all appliances.
Adopt policies and incentive programs to reduce electrical loads from equipment plugged into outlets (such as purchasing Energy Star equipment for municipal buildings, occupancy sensors, smart power strips, equipment controllers, etc.).	**Consistent.** The proposed Project would be constructed in accordance with Title 24 CALGreen requirements, which includes installation of Energy Star equipment and appliances in new buildings.

Action	Consistency
Facilitate deployment of renewable energy production and distribution and energy storage.	**Consistent.** The proposed Project would be constructed in accordance with the CALGreen Building Energy Efficiency Standards (Title 24 Part 6), including solar, and meet all other requirements related to energy efficiency standards.
Building Decarbonization	
Adopt all-electric new construction reach codes.	**Consistent**. The proposed Project is fully electric, does not propose any natural gas, and would comply with Title 24 Parts 6 and 11, including the installation of EV charging infrastructure in garages, electric heat pumps, and electric hookups for all appliances.
Adopt policies and incentive programs to reduce electrical loads from equipment plugged into outlets (such as purchasing Energy Star equipment for municipal buildings, occupancy sensors, smart power strips, equipment controllers, etc.).	**Consistent.** The proposed Project would be constructed in accordance with CALGreen requirements, which includes installation of Energy Star equipment and appliances in new buildings.
Facilitate deployment of renewable energy production and distribution and energy storage.	**Consistent.** The proposed Project would be constructed in accordance with the California Energy Code (Title 24 Part 6) to meet all requirements related to solar energy production and the CALGreen Building Energy Efficiency Standards (Title 24 Part 11) to meet efficiency standards.

Source: (California Air Resources Board, 2022, pp. 72-79)

Overall, implementation of the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Thus, impacts would not occur, and no mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulation would reduce potential impacts related to greenhouse gases.

CALGreen Compliance. As listed previously in Section 6, *Energy*.

COA AB 1881 Landscaping. The Project Conditions of Approval would require compliance with AB 1881 landscaping requirements (included in the GGMC in Section 9.12.040.085 and pursuant to the Title 24 regulations in GGMC Section 18.04.010.

Mitigation Measures

No mitigation measures related to greenhouse gas emissions are required.

References

Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A), prepared by EPD Solutions, 2026.

Level of Service (LOS) Screening Analysis, prepared by EPD Solutions, Inc., Appendix B.

South Coast Air Quality Management District Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Thresholds (SCAQMD 2008). Accessed: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf

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

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

Less than Significant Impact. 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 into the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that regulatory agencies have a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the home, workplace, or environment. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

Construction
The Project's proposed construction activities would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state requirements. These regulations include: the federal Occupational Safety and Health Act and Hazardous Materials Transportation Act; Title 8 of the California Code of Regulations (CalOSHA), and the state Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. As a result, the routine transport, use or disposal of hazardous materials during construction activities of the Project would be less than significant. No mitigation measures are required.

Operation
Operation of the Project would include residential uses, which would involve use of hazardous materials including solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. These types of materials are not acutely hazardous and would only be used and stored in limited quantities within the Project area. The normal routine use of these hazardous materials products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the Project. Therefore, the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant. No mitigation measures are required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact.

Construction
Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. To avoid an impact related to an accidental release during construction, best management practices (BMPs) are implemented as part of a SWPPP as required by the NPDES General Construction Permit. Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict onsite handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling and construction dewatering activities including 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.

Implementation of the required SWPPP and related regulations during construction would reduce potential impacts to a less than significant level.

Asbestos-Containing Materials. The use of asbestos-containing materials (a known carcinogen) and lead paint (a known toxin) was common in building construction prior to 1978 (the use of asbestos-containing materials in concrete products was common through the 1950s). Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the federal Environmental Protection Agency (EPA). Federal asbestos requirements are found in the Code of Federal Regulations (CFR) Title 40, Part 61, Subpart M, and are enforced in the Project area by the SCAQMD. SCAQMD Rule 1403 establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities.

Based on the age of the onsite structures, the Phase I (Appendix E) determined that it is possible that asbestos-containing building materials are present. As a result, asbestos surveys and abatement would be required prior to demolition of the existing buildings pursuant to the existing SCAQMD, Cal/OSHA, and Section 19827.5 of the California Health and Safety Code requirements.

SCAQMD Rule 1403 requires notification of the SCAQMD prior to commencing any demolition or renovation activities that involve asbestos containing materials. Rule 1403 also sets forth specific procedures for the removal of asbestos and requires that an onsite representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of asbestos-containing materials. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing and demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with asbestos-containing materials. With compliance with AQMD Rule 1403, potential impacts related to asbestos being released into the environment would be less than significant. No mitigation measures are required.

Lead Based Paint. Based on the age of the onsite structures, it is possible that lead-based paint may be present. Pursuant to existing regulations, a lead-based paint survey shall be completed prior to any activities with the potential to disturb suspected lead based painted surfaces. The regulations specify actions to manage and control exposure to lead-based paint (per the Code of Federal Regulations Title 29, Section 1926.62 and California Code of Regulations Title 8 Section 1532.1) that cover the demolition, removal, cleanup, transportation, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. In addition, Cal/OSHA's Lead in Construction Standard requires the Project to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. With compliance with the Cal/OSHA requirements, potential impacts related to lead-based paint being released into the environment would be less than significant. No mitigation measures are required.

Operation
Operation of the Project includes activities related to residential uses, which involve use of hazardous materials including solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. These types of materials are not acutely hazardous and would only be used and stored in limited quantities within the Project residences and maintenance areas. The normal routine use of these hazardous material products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the Project. Therefore, the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant. No mitigation measures are required.

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

Less than Significant Impact. The Sunnyside Elementary School is located adjacent to the Project site at 9972 Russell Avenue. As described in response a), construction and operation of the Project would involve the use, storage, and disposal of small amounts of hazardous materials on the Project site. These hazardous materials would be limited and used and disposed of in compliance with federal, state, and local regulations, which would reduce the potential for accidental release into the environment near the school. In addition, the proposed residential uses would not involve the use or handling of acutely hazardous materials.

Also, the emissions that would be generated from construction and operation of the Project were evaluated in the air quality analysis presented in Section 3, and the emissions generated from the Project would not cause or contribute to an exceedance of the federal or state air quality standards. Thus, the Project would not emit hazardous or handle acutely hazardous materials, substances, or waste near the school, and impacts would be less than significant. No mitigation measures are required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Phase I Environmental Site Assessment did not identify the Project site or any properties in the nearby area as included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Appendix E). In addition, a search of the California Department of Toxic Substances Control EnviroStor database did not identify the Project site or adjacent areas as a hazardous materials site. Thus, impacts related to hazards from being located on or adjacent to a hazardous materials site would not occur from implementation of the Project. No mitigation measures are required.

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?

No Impact. The Project site is not located within an airport land use plan or within 2 miles of an airport. The closest air facility to the Project is the Los Alamitos Joint Forces Training Base, located approximately 5 miles northwest of the Project site. The closest public airports to the Project site include Fullerton Municipal Airport that is over 7 miles to the north of the site and John Wayne Airport, which is located over 7.75 miles to the

southeast of the Project site. Therefore, the Project would not result in a safety hazard for people residing or working in the Project area, and no impacts would occur. No mitigation measures are required.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Construction
The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of new driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Russell Avenue or Kerry Street. Any temporary lane closures needed for utility connections or driveway access construction would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014), as incorporated into a Traffic Management Plan for the Project that the City requires for receipt of construction permits. The Traffic Management Plan would include designated haul routes, temporary traffic control devices, travel time restrictions, and other elements determined through the construction review and permitting process by the City's Public Works Division that would ensure that substantial traffic queuing along Russell Avenue or Kerry Street would not occur, and that all construction equipment would be staged on site. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access or evacuation impacts to a less than significant level. No mitigation measures are required.

Operation
Direct access to the Project site would be provided from driveways along Russell Avenue. The Project driveway and internal access has been reviewed and approved by OCFA and meets the design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers) that would be reviewed and approved by the City for compliance with GGMC standards that include the California Fire Code, which is adopted by reference in GGMC Chapter 18.04 and as amended in GGMC Chapter 18.16. Further, the City's standard Condition of Approval to comply with the OCFA Master Plan would be included. 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. No mitigation measures are required.

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

No Impact. The Project site is within an urbanized residential area of the City of Garden Grove. The Project site is surrounded by developed and urban areas. The Project site is not adjacent to any wildland areas. According to the CAL FIRE Hazard Severity Zone map, the Project site is not within a fire hazard zone. As a result, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations and City Condition of Approval would reduce potential impacts related to hazards and hazardous materials.

SWPPP. As listed below in Section 10, *Hydrology and Water Quality*.

COA: Fire Master Plan: The applicant shall comply with all applicable Orange County Fire Authority (OCFA) requirements, including but not limited to the Fire Master Plan.

SCAQMD Rule 1403 – Asbestos Containing Materials: The Project Plans and specifications shall implement compliance with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 1403. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of SCAQMD Rule 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

Lead Based Paint: The Project Plans and specifications shall implement compliance with the provisions of the Code of Federal Regulations Title 29, Section 1926.62, California Code of Regulations Title 8 Section 1532.1, and Cal/OSHA's Lead in Construction Standard to require a lead-based paint survey be conducted, and if lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

Mitigation Measures

No mitigation measures related to hazards and hazardous materials are required.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zone Map. Accessed:
https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

California Department of Toxic Substances Control EnviroStor database. Accessed:
https://www.envirostor.dtsc.ca.gov/public/

Phase I Environmental Site Assessment, prepared by Partner Engineering and Science, Inc, 2025 (Appendix E).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
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) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial 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?	☐	☐	☒	☐

The discussion below is based on the Preliminary Hydrology Report and the Preliminary Water Quality Management Plan, which are included as Appendix G and H.

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

Less than Significant Impact

Construction

Implementation of the proposed Project includes demolition of the existing buildings, pavement, and infrastructure, site preparation, construction of new buildings, and infrastructure improvements. Demolition of existing structures, grading, stockpiling of materials, excavation, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which would have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality. However, Section 6.40.050 of the GGMC states that all new development and significant redevelopment within the City shall be undertaken in accordance with the County DAMP, including any conditions and requirements established related to the reduction or elimination of pollutants in storm water runoff from the Project site, which are verified prior to the issuance of a grading permit and/or building permit by the City.

The DAMP requires construction sites to implement BMPs that address control of construction related pollutants discharges, including erosion/sediment control, onsite hazardous materials, and waste management (DAMP Section 8.0). Additionally, the Statewide NPDES Permit for General Construction Activity requires implementation of a SWPPP, by a Qualified SWPPP Developer. The SWPPP is required to be consistent with the County DAMP; address site-specific conditions related to construction; identify the sources of sediment and other pollutants that may affect the quality of storm water discharges during construction; and implement erosion control and sediment control BMPs to reduce or eliminate sediment, pollutants adhering to sediment, and other non-sediment pollutants in water discharges during construction. Typical erosion control methods that are designed to minimize potential pollutants entering stormwater during construction include:

- Perimeter gravel bags or silt fences to prevent offsite transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to a City approved SWPPP, which would be verified prior to the issuance of a demolition and/or grading permit would ensure that potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant. No mitigation measures are required.

Operation

The proposed Project includes operation of new residential uses. Potential pollutants associated with the proposed uses include various chemicals from cleaners, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. If these pollutants discharge into surface waters, it could result in degradation of water quality.

However, operation of the proposed Project would be required to comply with the requirements of the County DAMP and would be required to implement a Water Quality Management Plan (WQMP) that includes Low Impact Development (LID) features and BMPs to limit the potential for pollutants to enter surface water, such as storm water runoff. The Preliminary WQMP has been completed and is included as Appendix H. The purpose of a WQMP is to reduce discharge of pollutants by reducing or eliminating sources of pollutants, capture pollutants, and manage site runoff volumes and flow rates through application of appropriate LID features and BMPs. The WQMP is required to include implementation of non-structural, structural, source control and treatment control BMPs that have been designed to protect water quality. As described in the Project description, the Project would install drainage features to convey runoff to biofiltration treatment devices that would be installed on the site, which have been designed to capture, infiltrate, and treat flows from the 85th percentile storm as required by the DAMP. The additional types of BMPs that would be implemented as part of the Project WQMP are listed in Table WQ-1.

Table WQ-1: Types of BMPs Incorporated into the Project WQMP

Type of BMP	Description of BMPs
LID Site Design	Optimize the site layout: The site has been designed so that runoff from impervious surfaces would flow to either landscaped areas or an underground infiltration tank for treatment by infiltration.
	Use pervious surfaces: Landscaping is incorporated into the Project design to increase the amount of pervious area and onsite retention of stormflows.
Source Control	Storm Drain Stenciling: All inlets/catch basins would be stenciled with the words "Only Rain Down the Storm Drain," or equivalent message.
	Litter Control: Design and construct trash and waste storage areas to reduce pollution introduction and provide or arrange for weekly sweeping and trash pick-up that can be done as part of landscape maintenance.
	Need for future indoor & structural pest control: The buildings would be designed to avoid openings that would encourage entry of pests.
	Landscape/outdoor pesticide use: Landscape plans would accomplish all of the following: • Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution. • Consider using pest-resistant plants, especially adjacent to hardscape. • To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.
	Roofing, gutters, and trim: The architectural design would avoid roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff.
	Sidewalks and parking lots: Sidewalks and parking lots shall be swept regularly to prevent the accumulation of litter and debris. Debris from pressure washing would be collected to prevent entry

Type of BMP	Description of BMPs
	into the storm drain system. Wash water containing any cleaning agent or degreaser would be collected and discharged to the sanitary sewer and not discharged to a storm drain.
Treatment Control	Biofiltration Systems: The underground biofiltration treatment devices proposed for the Project would detain runoff, filter it, prior to infiltration into site soils.

As described previously, a WQMP is required to be approved prior to the issuance of a building or grading permit. The Project's WQMP would be reviewed and approved by the City to ensure it complies with the DAMP regulations. In addition, the City's permitting process would ensure that all LID features in the WQMP would be implemented with the Project. Overall, implementation of the WQMP pursuant to the existing regulations would ensure that operation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant. No mitigation measures are required.

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

Less than Significant Impact. The Preliminary WQMP for the Project (Appendix H) describes that the Project site is largely (86.8%) impervious, as it is generally covered by the existing pavement and building structures, except for the areas of landscaping the site. In the existing condition, storm flows drain across the site to the north toward Russell Avenue and west toward Kerry Street where flows are conveyed westerly and southerly until entering the storm drain system through a catch basin on Donegal Drive near the Trask Avenue intersection. The Project site currently has no water quality or drainage devices installed.

The Preliminary WQMP for the Project details that the pervious areas on the site would increase with the proposed Project due to installation of a central open space recreation area and approximately 16,278 square feet of landscaping. After Project development, the site would contain 20.7 percent pervious areas, which would be an increase of 7.5 percent. Also, stormwater on the site would be conveyed to the proposed biofiltration treatment devices that would treat and infiltrate flows into site soils. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

In addition, groundwater within the Project region is managed by the Orange County Water District (OCWD). To ensure the Basin is not overdrawn, OCWD monitors water levels and recharges the Basin with local and imported water. Continued management of the groundwater basin by OCWD ensures that substantial depletion of groundwater supplies would not occur. Thus, impacts related to the groundwater recharge would not occur. No mitigation measures are required. The evaluation of water supplies needed for the Project is provided in Section 19, *Utilities and Service Systems*.

ci) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Less than Significant Impact. The Project site does not include a stream, river, creek, or other water body.

Construction
Construction of the proposed Project would require demolition of the existing buildings foundations and floor slabs and pavement, and excavation and grading activities that would expose and loosen building materials and sediment, which has the potential to mix with storm water runoff and result in erosion or siltation offsite. However, the Project site does not include any slopes, which reduces the erosion potential.

The NPDES Construction General Permit and Orange County DAMP require preparation and implementation of a SWPPP by a Qualified SWPPP Developer for the proposed construction activities. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities. With implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion, siltation, and increases in stormwater runoff would be less than significant. No mitigation measures are required.

Operation
The Preliminary WQMP details that the Project site currently consists of 86.8 percent impervious surfaces and 13.2 percent pervious surfaces. After completion of Project construction, the site would be 79.3 percent impervious and 20.7 percent pervious (Appendix H), which is a reduction of 7.5 percent impervious surface area. The pervious areas proposed for the Project would be landscaped, which would inhibit erosion.

The proposed Project would maintain the existing drainage pattern. In the existing condition, storm flows drain across the site to the north toward Russell Avenue and west toward Kerry Street. With implementation of the Project, stormwater runoff would be conveyed to landscape areas and to biofiltration treatment devices for treatment and infiltration into site soils. The DAMP requires new development projects to prepare a WQMP including BMPs to reduce the potential of erosion and/or sedimentation through site design and structural treatment control BMPs. The Preliminary WQMP has been completed and is included as Appendix H. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City to ensure that the site-specific design limits the potential for erosion and siltation. Overall, the proposed drainage system and adherence to the existing regulations would ensure that Project impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant. No mitigation measures are required.

cii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than Significant Impact. The Project site does not include, and is not adjacent to, a stream or river. Implementation of the Project would not alter the course of a stream or river.

Construction
Construction of the proposed Project would require demolition of the existing building, including foundation, floor slabs, and utilities systems, and would require excavation and grading activities. These activities could temporarily alter the existing drainage pattern of the site and change runoff flow rates. However, as described previously, implementation of the Project requires a SWPPP that would address site specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern (including those of a stream or river) during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP as verified by the City through the construction permitting process would prevent construction-related flooding impacts from potential alteration of a drainage pattern, stream, or river on or offsite from development activities. Therefore, construction impacts would be less than significant. No mitigation measures are required.

Operation
As described previously, the proposed Project would result in a 7.5 percent increase of pervious surfaces. The Project would maintain the existing drainage pattern and convey runoff to landscape areas and to biofiltration treatment devices that would filter and infiltrate runoff into site soils. This proposed drainage has been designed to capture, infiltrate, and treat flows pursuant to the DAMP requirements. As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City to ensure that these design flows would be accommodated. Overall, the proposed drainage system and adherence to the existing DAMP regulations would ensure that Project impacts related to alteration of a drainage pattern or flooding from operational activities would be less than significant. No mitigation measures are required.

ciii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. As described previously, the Project site does not include, and is not adjacent to, a stream or river. Implementation of the Project would not alter the course of a stream or river.

Construction
As described in the previous response, construction of the proposed Project would require demolition and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. However, implementation of the Project requires a SWPPP that would address site specific pollutant and drainage issues related to construction of the Project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP as verified by the City through the construction permitting process would prevent construction-related impacts related to increases in run-off and pollution from development activities. Therefore, impacts would be less than significant. No mitigation measures are required.

Operation

As described previously, the Project site is largely (86.8%) impervious and redevelopment of the site would increase pervious areas by 7.5 percent. Storm flows would drain to landscape areas and to biofiltration treatment devices that have been designed to accommodate the Project and would provide stormwater filtration, as required by the DAMP. Therefore, redevelopment of the Project site would not result in an increase in runoff that would exceed the capacity of the existing City storm drain system or provide substantial additional sources of polluted runoff. No mitigation measures are required.

civ) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would impede or redirect flood flows??

Less than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06059C0139, the Project site is not within a flood zone. As detailed in the previous responses, storm flows would drain to landscape areas and to catch basins that would route runoff to biofiltration treatment devices that have been designed to accommodate the Project per the 85th percentile storm water flows as required by the DAMP. Also, as described previously, the Project would increase pervious areas on the site by 7.5 percent compared to existing conditions. Therefore, the Project would not result in impeding or redirecting flood flows by the addition of the impervious surfaces. As detailed previously, the City's permitting process would ensure that the drainage system specifications adhere to the DAMP regulations, and compliance with existing regulations would ensure that impacts would be less than significant. No mitigation measures are required.

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

No Impact. A 100-year flood hazard area is an area in which a flood event has a 1 percent (1%) probability of occurring in any given year. The FEMA FIRM for the Project site and vicinity (FEMA FIRM number 06059C0139) shows that the site is within a 0.2 percent (0.2%) annual chance of flood hazard and is identified as "Zone X". Therefore, the site is not within a 100-year flood zone. In addition, the Project site does not contain any bodies of water and is not located in the vicinity of any bodies of water that could result in flooding on the Project site. Thus, the Project site is not located within a 100-year flood hazard area as mapped by FEMA, and impacts related to flooding would not occur. No mitigation measures are required.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The proposed Project is over 7 miles from the ocean shoreline. Based on the distance of the Project site to the Pacific Ocean, the Project site is not at risk of inundation from tsunami. Therefore, the proposed Project would not risk release of pollutants from inundation from a tsunami. No impact would occur, and no mitigation is required.

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. The Project site is not located adjacent to any water retention facilities. For this reason, the Project site is not at risk of inundation from seiche waves. Therefore, the proposed Project would not risk the release of pollutants from inundation from seiche. No impact would occur, and no mitigation is required.

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

Less Than Significant Impact. As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit, 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, new development projects are required to implement a WQMP that would comply with the Orange County DAMP. The WQMP and applicable BMPs are verified as part of the City's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed Project would not conflict with or obstruct a water quality control plan.

In addition, as detailed previously, groundwater within the Project region is managed by OCWD. To ensure the Basin is not overdrawn, OCWD monitors water levels and recharges the Basin with local and imported water. Continued management of the groundwater basin by OCWD ensures that substantial depletion of groundwater supplies would not occur. Thus, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations would reduce potential impacts related to hydrology and water quality.

Stormwater Pollution Prevention Plan: Prior to grading permit issuance, the Project developer shall have a SWPPP prepared by a QSD (Qualified SWPPP Developer) pursuant to the Orange County DAMP. The SWPPP shall incorporate all necessary BMPs and other DAMP requirements to comply with NPDES regulations to limit the potential of polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City staff, or designee to confirm compliance.

Water Quality Management Plan: Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City Building and Safety Division. The WQMP shall identify all post-construction, site design, source control, and treatment control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters. The WQMP shall comply with GGMC Section 6.40.050, the Orange County DAMP, and the Santa Ana Region, Regional Water Quality Control Board (RWQCB) requirements in effect at the time permitting.

Mitigation Measures

No mitigation measures related to hydrology and water quality are required.

References

California Department of Water Resources Inundation Maps. Accessed:

https://water.ca.gov/Programs/All-Programs/Division-of-Safety-of-Dams/Inundation-Maps

City of Garden Grove Municipal Code. Accessed at:
https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

Federal Emergency Management Agency Flood Maps. Accessed: https://msc.fema.gov/portal

Orange County Water District Groundwater Management. Accessed: https://www.ocwd.com/what-we-do/groundwater-management/

Preliminary Hydrology Report, 2025. Prepared by CA Engineering, Inc. Appendix G.

Preliminary Water Quality Management Plan, 2025. Prepared by CA Engineering, Inc. Appendix H.

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

a) Physically divide an established community?

No Impact. The Project site is currently developed with a church, preschool, wireless facility, and daycare. The Project site is part of the established community and is located within an urban area and is adjacent to roadways, residential, church, and school uses. Direct access to the site is provided by a driveway along Russell Avenue, which bounds north side of the Project site and a driveway along Kerry Street bounds the west side of the site. Both single-family and multi-family residences are located to the north beyond Russell Avenue and to the west beyond Kerry Street. Single-family residences and a church parking lot bound the south of the site, and Sunnyside Elementary School is located to the east.

The proposed Project would redevelop the site to provide 26 residential townhomes with open space, landscaping and parking. The new residences would be accessed by a driveway along Russell Avenue, which is consistent with the existing site access. The proposed townhomes would be consistent with the existing residential uses and complementary to the existing school and church uses. Therefore, the change of the Project site from a church, preschool, and daycare to new residential townhomes with open space and landscaping would not physically divide an established community. In addition, the Project would not change roadways or install any infrastructure that would result in a physical division. Thus, the proposed Project would not result in impacts related to physical division of an established community. No mitigation measures are required.

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

Less Than Significant Impact.

General Plan

The Project site currently has a General Plan land use designation of Low Density Residential (LDR), as shown previously in Figure 4, *Existing General Plan Land Use Designations*. The General Plan describes that the LDR land use is characterized by detached, single-unit structures and accessory dwelling units, and allows up to 11 dwelling units per acre.

The proposed Project includes a General Plan Amendment to change the land use designation of the site to Low Medium Density Residential (LMR) that allows a residential density between 11 and 21 dwelling units per

acre. Consistent with the proposed LMR designation, the Project would develop the 1.81-acre Project site with 26 residential townhomes, which would result in a density of 14.4 dwelling units per acre and would be within the allowable LMR residential density. The Project would be consistent with the density allowable under the proposed General Plan land use designations. The proposed land use designation change and development of residential townhomes on the site pursuant to the LMR General Plan land use designation would not result in conflict with any regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Additionally, the Project would comply with the goals and policies of the City's General Plan that are relevant to the Project and related to avoiding or mitigating an environmental effect, as detailed in Table LU-1. As such, no impact related to conflict with a General Plan policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect would occur. No mitigation measures are required.

Table LU-1: General Plan Policy and Goal Consistency

General Plan Element / Goal / Policy	Project Consistency
Land Use Element	
Policy LU-2.3: Prohibit uses that lead to deterioration of residential neighborhoods or adversely impact the safety or the residential character of a residential neighborhood.	**Consistent.** The proposed Project would extend and enhance the existing residential neighborhood by transitioning a site from largely a surface parking lot and aged church, preschool, and daycare structures into a new residential neighborhood with new streetscaping that would improve the existing character of the site and be consistent with surrounding one and two-story residential single-and multi-family structures. The new residences would not deteriorate or impact safety of the neighborhood.
Circulation Element	
Policy CIR-3.3: Review new development or redevelopment projects adjacent to established residential neighborhoods for potential traffic intrusion impacts. The review should recommend methods, such as but not limited to 1) expanding parkways to reduce the roadway width, 2) limiting the number of ingress/egress locations on-site, 3) traffic circles, 4) diverters, or speed humps, 5) curb extensions, 6) entrance treatments, or other effective traffic management techniques that reduce or eliminate the traffic intrusion impacts.	**Consistent.** The proposed Project would be accessed from the existing adjacent roadways and would reduce vehicular trips compared to existing uses, as detailed in Section 17, *Transportation*. Also, the City's construction review and permitting process would ensure that the site driveway and other site design features would not result in traffic intrusion impacts.
Policy CIR-3.5: Require new developments to implement access and traffic management plans that will reduce the potential for neighborhood traffic intrusion through factors such as driveway location, turn restrictions, shuttle bus operations, and/or travel demand strategies.	**Consistent.** The proposed Project has been reviewed by the City's traffic engineering staff to ensure that the site driveway and other site design features would not result in traffic intrusion impacts. As described previously, the Project would reduce vehicular trips compared to the existing site use, which would reduce the potential for neighborhood traffic intrusion.
Goal CIR-4: A reduction in vehicle miles traveled in order to create a more efficient urban form.	**Consistent.** As detailed in Table T-1, the proposed Project would result in 58 fewer daily trips compared to the existing land use of the site, which would result in a reduction in vehicle miles traveled. In addition, the proposed LMR General Plan Land Use designation

General Plan Element / Goal / Policy	Project Consistency
	provides for a more efficient urban form than the existing LDR General Plan Land Use designation. The proposed LMR use would increase the number of residences in an urban area near existing community resources such as the adjacent school, commercial uses along Brookhurst Street, and near existing transit stops on Brookhurst Street.
Policy CIR-5.4: Provide appropriate pedestrian access throughout the City of Garden Grove.	**Consistent.** The proposed Project would install new onsite pedestrian access throughout the site that would connect to the new sidewalk that the Project would install along the Russell Avenue and Kerry Street site frontages.
Policy CIR-7.1: Design safe and efficient vehicular access to properties from arterial streets to ensure efficient vehicular ingress and egress.	**Consistent.** The proposed Project has been reviewed by the City's Traffic Engineering to ensure that the site driveway and other site design features would not result in traffic safety impacts and to ensure efficient vehicular ingress and egress.
Policy CIR-7.2: Review development plans and encourage designs that consolidate access locations onto streets and provide adequate turn lanes into sites to minimize conflicts with through traffic on adjacent streets.	**Consistent.** The proposed Project has been reviewed by the City's Traffic Engineering to ensure that the site driveway and other site design features would not result in conflicts with through traffic on adjacent streets.
Goal CIR-9: Improved aesthetic quality and maintenance of arterial highways and local roadways.	**Consistent.** The proposed Project would install new sidewalks and new landscaping along Russell Avenue and Kerry Street frontages, as shown in Figure 10, *Conceptual Landscaping Plan*; thus, improving the aesthetic quality of the surrounding local roadways.
Goal CIR-11: Continued compliance with regional congestion management, transportation demand, traffic improvement, air quality management, and growth management programs.	**Consistent.** As detailed in Table T-1, the proposed Project would result in 58 fewer daily trips compared to the existing land use of the site, which would be consistent with this goal.
Infrastructure Element	
Policy INFR-1.2: New development and redevelopment projects shall ensure that water infrastructure systems are adequate to serve the development.	**Consistent.** As detailed in Section 19, *Utilities and Service Systems*, water and sewer Will-Serve letters have been received for the Project and detail that water infrastructure systems are adequate to serve the development.
Policy INFR 3.3: Minimize the adverse effects of urbanization upon drainage and flood control facilities.	**Consistent.** The proposed Project would not increase utilization of drainage and flood control facilities. Drainage from the Project site would be captured by biofiltration devices and runoff would infiltrate into site soils, as detailed in Section 10, *Hydrology and Water Quality*.
Noise Element	
Goal N-1: Noise considerations must be incorporated into land use planning decisions.	**Consistent.** The Noise Study for the proposed Project has been prepared to incorporate noise considerations into land use planning decisions.

General Plan Element / Goal / Policy	Project Consistency
Policy N-1.1: Require all new residential construction in areas with an exterior noise level greater than 55 dBA to include sound attenuation measures.	**Consistent.** As detailed in Section 13, *Noise,* exterior noise levels are below the General Plan acceptable ambient noise levels.
Policy N-1.2: Incorporate a noise assessment study into the environmental review process, when needed for a specific project for the purposes of identifying potential noise impacts and noise abatement procedures.	**Consistent.** A Noise Study for the proposed Project has been prepared and is included as Appendix I, which details that no noise abatement measures are required and a 10-foot setback from the southern site boundary would mitigate potential construction vibration impacts, as detailed in Section 13, *Noise*.
Policy N-1.3: Require noise reduction techniques in site planning, architectural design, and construction, where noise reduction is necessary consistent with the standards in Tables 7-1 and 7-2, Title 24 of the California Code of Regulations, and Section 8.47 of the Municipal Code.	**Consistent.** A Noise Study for the proposed Project has been prepared and is included as Appendix I, which details that no noise reduction measures are required, and that the Project is consistent with the standards in General Plan Tables 7-1 and 7-2, Title 24 of the California Code of Regulations, and Section 8.47 of the GGMC.
Policy N-1.4: Ensure acceptable noise levels are maintained near schools, hospitals, convalescent homes, churches, and other noise sensitive areas.	**Consistent.** The Noise Study for the proposed Project has been prepared to ensure that acceptable noise levels are maintained near the adjacent school, church, and residential noise sensitive areas. As detailed in Section 13, *Noise*, the proposed Project would maintain acceptable noise levels on and surrounding the site.
Policy N-1.7: Avoid locating noise-sensitive land use in existing and noise-impacted areas.	**Consistent.** The proposed Project is not located in a noise-impacted area. As detailed in Section 13, *Noise,* exterior noise levels are below the General Plan acceptable ambient noise levels for the proposed Project.
Policy N-2.2: Fully integrate noise considerations into land use planning decisions to prevent new noise/land use conflicts.	**Consistent.** The Noise Study for the proposed Project has been prepared to integrate noise considerations into this Project's land use planning decisions to prevent new noise/land use conflicts. As detailed in Section 13, *Noise*, the proposed residences would not result in any noise/land use conflicts.
Policy N-2.3: Incorporate noise reduction features for items such as but not limited to parking and loading areas, ingress/egress point, and refuse collection areas, during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses.	**Consistent.** A Noise Study for the proposed Project has been prepared and is included as Appendix I, which details that no noise reduction measures are required.
Policy N-2.4: Permit only those new development or redevelopment projects that have incorporated appropriate mitigation measures, so that standards contained in the Noise Element or adopted ordinance are met.	**Consistent.** A Noise Study for the proposed Project has been prepared and is included as Appendix I, which details that no noise reduction measures are required, and that the Project is consistent with the standards in General Plan and the noise regulations in Section 8.47 of the GGMC.
Goal N-3: Minimized noise impacts from freeways, ensuring that City and State interior and exterior noise standards are not exceeded.	**Consistent.** A Noise Study for the proposed Project has been prepared and is included as Appendix I, which details that interior and exterior noise standards would not be exceeded and that no noise reduction measures are required.

General Plan Element / Goal / Policy	Project Consistency
Goal N-4: Minimize noise impacts for residential uses and noise sensitive receptors along the City's arterial streets, ensuring that City and State interior and exterior noise levels are not exceeded.	**Consistent.** A Noise Study for the proposed Project has been prepared and is included as Appendix I, which details that interior and exterior noise standards would not be exceeded and that no noise reduction measures are required.
Air Quality Element	
Policy AQ-2.3: Continue to improve existing sidewalks, bicycle trails, and parkways, and require sidewalk and bicycle trail improvements and parkways for new development or redevelopment projects.	**Consistent.** The proposed Project would install new onsite pedestrian access throughout the site that would connect to the new sidewalk that the Project would install along the Russell Avenue and Kerry Street site frontages.
Policy AQ-4.1: Review site developments to ensure pedestrian safety and promote non-automotive users.	**Consistent.** The proposed Project would install new onsite pedestrian access throughout the site that would connect to the new sidewalk along the Russell Avenue and Kerry Street site frontages that would be reviewed and permitted by the City to ensure compliance with applicable pedestrian safety design requirements.
Policy AQ-4.3: Encourage "walkable" neighborhoods with pedestrian walkways and bicycle paths in residential and other types of developments to encourage pedestrian rather than vehicular travel.	**Consistent.** The proposed Project would install new onsite pedestrian access throughout the site that would connect to the new sidewalk that the Project would install along the Russell Avenue and Kerry Street site frontages.
Conservation Element	
Policy CON-1.3: Promote water conservation in new development or redevelopment project design, construction, and operations.	**Consistent.** The proposed Project would implement water conservation measures as required by CALGreen and Title 24 requirements, such as use of water efficient plumbing fixtures and irrigation systems, routing runoff to landscape areas, and provision of separate meters for each residence.
Policy CON-2.1: Enhance water infiltration throughout watersheds by decreasing accelerated runoff rates and enhancing groundwater recharge. Whenever possible, maintain or increase a site's pre-development infiltration to reduce downstream erosion and flooding.	**Consistent.** The proposed Project would decrease runoff rates and enhance infiltration onsite. Drainage from the Project site would be captured by biofiltration devices and runoff would infiltrate into site soils, as detailed in Section 10, *Hydrology and Water Quality*.
Policy CON-2.2: Encourage practices that enable water to percolate into the surrounding soil, instead of letting sediment, metals, pesticides and chemicals runoff directly into the storm drain system, creeks, or regional flood control facilities.	**Consistent.** The proposed Project would treat and infiltrate stormwater onsite. Drainage from the Project site would be captured by biofiltration devices and runoff would infiltrate into site soils, as detailed in Section 10, *Hydrology and Water Quality*.
Policy CON-2.4: Continue to comply with Federal, State, and regional governments and agencies to protect and improve the quality of local and regional groundwater resources available to the City.	**Consistent.** The proposed Project would implement a site specific construction SWPPP and a WQMP to comply with the Orange County DAMP and NPDES permitting, as detailed in Section 10, *Hydrology and Water Quality*.
Goal CON-7: Significant historical, architectural, archeological, and cultural value resources shall be preserved and protected.	**Consistent.** The proposed Project would not result in impacts to significant historic, archaeological, or cultural value resources, as detailed in Section 5, *Cultural Resources*.

General Plan Element / Goal / Policy	Project Consistency
Policy CON-7.1: Preserve and protect Garden Grove's significant historical, archaeological and cultural value resources.	**Consistent.** The proposed Project would not result in impacts to significant historic, archaeological, or cultural value resources, as detailed in Section 5, *Cultural Resources*.
Policy CON-7.2: Preserve Garden Grove's significant historic resources to promote community identity, stability, and aesthetic character.	**Consistent.** The proposed Project would not result in any impacts to significant historic resources, as detailed in Section 5, *Cultural Resources*.
Safety Element	
Policy SAF-2.2: Encourage Crime Prevention Through Environmental Design (CPTED) techniques; design that discourages crime and promotes pedestrian safety, for all new development and redevelopment projects.	**Consistent.** The proposed Project includes design measures that incorporate the concepts of Crime Prevention Through Environmental Design (CPTED), which involve 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 residents the ability to monitor activity.
Goal SAF-6: Minimize risk associated with seismic activity and geologic conditions to people and property.	**Consistent.** The proposed Project would be required to be implemented consistent with the California Building Code as included in the GGMC Title 18 Building Codes and Regulations, which would minimize risk associated with seismic activity and geologic conditions to people and property.
Policy SAF-6.1: Avoid or minimize to the greatest extent feasible hazards resulting from development on unstable ground conditions.	**Consistent.** The proposed Project would be required to be implemented consistent with the California Building Code as included in the GGMC Title 18 Building Codes and Regulations, which would minimize hazards related to unstable ground conditions.
Policy SAF-6.3: Ensure that new structures are seismically safe through the proper design and construction. The minimum level of design necessary would be in accordance with seismic provisions and criteria contained in the most recent version of the State and County Codes. Construction shall require effective oversight and enforcement to ensure adherence to the earthquake design criteria.	**Consistent.** The proposed Project would be required to be implemented consistent with earthquake design criteria of the California Building Code as included in the GGMC Title 18 Building Codes and Regulations, which would minimize seismic related hazards.
Policy SAF-10.11: Encourage infill, redevelopment, and higher density development consistent with the goals and policies of the Land Use Element.	**Consistent.** The proposed Project consists of infill, redevelopment, and higher density housing that, as detailed throughout this Table, is consistent with the relevant General Plan policies.
Housing Element	
Goal H-1: Preserve, maintain, and enhance housing and neighborhoods citywide.	**Consistent.** The proposed Project would provide additional housing within an existing neighborhood that would assist in preserving and enhancing the neighborhood.
Policy H-1.1: Neighborhood Preservation. Preserve the character, scale, and quality of established residential neighborhoods.	**Consistent.** The proposed Project would provide two-story residential townhomes that would be consistent with the character, scale, and quality of the established residential neighborhood.

General Plan Element / Goal / Policy	Project Consistency
Policy H-1.10: Sustainable Practices. Promote and encourage sustainable development and green building practices for all new residential development and the retrofit of existing housing.	**Consistent.** The proposed Project would be required to meet the current Title 24 energy efficiency standards, as included in GGMC Section 18.04.010 that include insulation; solar panels, use of energy-efficient HVAC equipment; solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems and appliances. Thus, the Project would implement sustainable development and green building practices.
Goal H-2: Housing supply to accommodate housing needs at all affordability levels.	**Consistent.** The proposed Project would result in additional housing supply to accommodate needs of above-moderate income households.
Goal H-3: A range of available housing types, densities, and affordability levels to meet diverse community needs.	**Consistent.** The California Department of Finance data from May 2025 states that there are 50,273 housing units within the City. Of these housing units, 97.1 percent of them were occupied, 9 percent were single-family attached residences, and 8.5 percent were residences within buildings containing between 2 and 4 units. The proposed Project would provide additional attached single-family residences that would be in buildings containing 3 and 4 units; and thus, would contribute to the range of available units and increase the number of attached residences in groupings of between 2 and 4 units in the City increasing the diversity of housing.
Policy H-3.1: Adequate Housing Sites. Maintain land use policies and regulations that create capacity for development of a range of residential development types that can fulfill local housing needs, including accessory dwelling units, low-density single family uses, moderate-density townhomes and middle housing, higher-density apartments and condominiums, senior housing, and mixed-use projects.	**Consistent.** The proposed Project would implement a PUD that creates capacity for residential development to fulfill local housing needs, including moderate-density townhomes.
Policy H-3.2: Meeting Housing Needs. Provide adequate sites to encourage housing development that will meet the needs of all income groups.	**Consistent.** The 2021-2029 Housing Element details that the City of Garden Grove has a RHNA for 8,936 new residential units for above moderate income households. The proposed Project would provide an adequate site and new housing to assist in meeting this requirement.
Policy H-3.3: Balance of Housing Types. Promote a balance of housing types, including mixed use development, to meet the needs of the community.	**Consistent.** The proposed Project would provide additional attached townhome residences that would contribute to the balance housing types within the City.
Policy H-3.7: Infill Housing. Encourage infill housing development that is compatible in character with established residential neighborhoods.	**Consistent.** The proposed Project would implement infill housing that would consist of two-story duplex structures that would be compatible with the surrounding established residential neighborhood of one and two-story residences.
Policy H-3.8: New Housing. Critically analyze the location of any proposed new housing to determine suitability for healthy living conditions.	**Consistent.** The Project site would provide healthy living conditions within an existing neighborhood adjacent to residences, a school, and a church. There are no onsite or adjacent conditions that would be unhealthy or otherwise generate unsuitability for residential uses.

Zoning

The Project site is zoned Single-Family Residential (R-1), as shown previously in Figure 5, *Existing Zoning Designations*. Section 9.08.020.020 of the GGMC states that the R-1 zone is intended to provide for the establishment and promotion of single-family detached residences on individual lots and compatible associated activities. Section 9.08.020.020 of the GGMC details that churches, child daycare centers, religious schools, educational institutions are permitted within the R-1 zone with a Conditional Use Permit (CUP).

The proposed Project includes a zoning designation amendment to change the zoning of the site from Single-Family Residential (R-1) to Planned Unit Development (PUD) with the general R-2 (Limited Multiple Residential) zoning designation used as the base guiding standards, which implements the LMR General Plan land use designation. The proposed zoning amendment change and development of residential townhomes on the site pursuant to the PUD and consistent with the proposed LMR General Plan land use designation would not result in conflict with any regulation adopted for the purpose of avoiding or mitigating an environmental effect. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

There are no existing regulations or Conditions of Approval related to land use and planning that are applicable to the Project. Regulations listed in Table LU-1 are listed in applicable environmental topic sections herein.

Mitigation Measures

No mitigation measures related to land use and planning are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
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?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. In 1975, the California Legislature enacted the Surface Mining and Reclamation Act which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified based on geologic factors without regard to existing land use and land ownership. The areas are categorized into 4 Mineral Resource Zones (MRZ):

MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated.

MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

The mapping by the California Geological Survey indicates that the Project site is located within an area designated as MRZ-3, which is an area where the significance of mineral deposits is not evaluated. In addition, the Project site is not designated/zoned for the extraction of mineral deposits and no active mining operations exist in the City.

The Project site has no history of mining. In addition, the site is located within a residential, church, and school area that does not include mining. Therefore, implementation of the Project would not cause the loss of availability of mineral resources valuable to the region or state, and no impact would occur. No mitigation measures are required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on the general plan, specific plan or other land use plan?

No Impact. The Project site and the surrounding vicinity are highly urbanized, and they are not in or near a mining site identified by the City's General Plan. The site currently has General Plan land use and zoning designations for residential uses. No mineral extraction activities occur on or near the Project site, and it is not

located within an area known to contain locally important mineral resources. Therefore, the Project would not result in 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 as a result of Project implementation. No impacts would occur. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

There are no existing regulations and/or City Conditions of Approval related to mineral resources that are applicable to the Project.

Mitigation Measures

No mitigation measures related to mineral resources are required.

References

California Department of Conservation Mineral Land Classification Map Anaheim Quadrangle. Accessed: https://maps.conservation.ca.gov/mineralresources/

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Focused General Plan Update and Zoning Amendments Draft Environmental Impact Report (SCH# 2021060714), 2021. Accessed: https://ceqanet.opr.ca.gov/Project/2021060714

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
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, which is included as Appendix I.

State Law

An interior community noise equivalent level (CNEL) of 45 decibels (dB) is mandated by the State of California Noise Insulation Standards (CCR, Title 24, Part 6, Section T25-28) for residential dwellings and hotel and motel rooms.

City of Garden Grove General Plan Noise Element

The City's General Plan Noise Element includes a noise and land use compatibility matrix (Table 7-1) to determine if new land uses are compatible with the existing noise environment. The table identifies noise environments that are less than 65 A-weighted decibel (dBA) CNEL to be normally acceptable for multiple family residential land uses and areas that are less than 70 dBA CNEL are conditionally acceptable with low density, single-family, and duplex residential uses that have air conditioning systems.

Garden Grove Municipal Code

GGMC Section 8.47.040 outlines the City's exterior noise limits as it relates to stationary noise sources. The residential limits are 55 dBA between 7:00 a.m. and 10:00 p.m. and 50 dBA between 10:00 p.m. and 7:00 a.m.

GGMC Section 8.47.040 states that these ambient base noise levels shall be used as the basis for determining noise levels in excess of those allowed unless the actual measured ambient noise level occurring at the same time as the noise under review is being investigated exceeds the ambient base noise level. When the actual measured ambient noise level exceeds the ambient base noise level, the actual measured ambient noise level shall be used as the basis for determining whether or not the subject noise exceeds the level allowed by this section. In situations where two adjoining properties exist within two different use designations, the most restrictive ambient base noise level will apply. Sections 8.47.040 and 8.47.050(C) state that the noise standard for a cumulative period of more than 30 minutes in any hour is the ambient base noise level plus 5 dBA, as

measured at the property line of the noise generation property. Table N-1 lists the ambient base noise levels and noise level standards for various sensitive and conditionally sensitive uses.

Table N-1: Municipal Code Ambient Base Noise Levels and Noise Level Standards

Use Designations	Ambient Base Noise Level	Noise Level Standard	Time of Day
Residential Use	55 dBA	60 dBA	7:00 a.m. - 10:00 p.m.
	50 dBA	55 dBA	10:00 p.m. - 7:00 a.m.
Institutional Use	65 dBA	70 dBA	Any Time
Office-Professional Use	65 dBA	70 dBA	Any Time
Hotels and Motels	65 dBA	70 dBA	Any Time

Source: Noise and Vibration Impact Analysis, Appendix I
dBA = A-weighted decibels

GGMC Section 8.47.060(d) Permitted Construction Hours and Days, states that it is unlawful for any person within a residential area, or within a radius of 500 feet therefrom, to operate equipment or perform any construction or repair work on buildings, structures, or projects, including construction-related vehicles arriving, idling, or being loaded/unloaded at or near a construction site, or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device outside of the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. No construction or repair work shall be permitted on Sundays or federal holidays. This is a standard City Condition of Approval.

Federal Transit Administration

The FTA *Transit Noise and Vibration Impact Assessment* (2018) provides construction noise criteria to determine if the project would create a substantial temporary noise increase to the nearby sensitive receptors. The criteria for a detailed assessment provide a residential threshold of 80 dBA Leq during the daytime.

The FTA *Transit Noise and Vibration Impact Assessment* also provides thresholds for increases in ambient noise from vehicular traffic based on increases to ambient noise. An impact would occur if existing noise levels at noise-sensitive land uses (e.g. residential, etc.) are less than 60 dBA Ldn and the project creates an increase of 3 dBA or greater project-related noise level increase; or if existing noise levels range from 60 to 65 dBA Ldn and the project creates 2 dBA or greater noise level increase. Noise level increase of 1 dBA or less would not result in an impact.

Caltrans Transportation and Construction Vibration Guidance Manual

California Department of Transportation's (Caltrans) Transportation and Construction Vibration Guidance Manual guidelines are used as a screening tool for assessing the potential for adverse vibration effects related to structural damage and human perception. The guidance manual provides thresholds for continuous (construction-related) and transient (transportation-related) sources of vibration, which found that the human response becomes distinctly perceptible at 0.25 inch per second PPV for transient sources at 0.04 inch per second PPV for continuous sources; and that the threshold for building damage to older residential structures of 0.30 inch per second PPV.

Sensitive Receptors

The nearest sensitive receptors to the Project site are single-family residences located approximately 10 feet south of the Project site southern boundary. There are also residences to the north of the site beyond Russell Avenue, and to the west of the site beyond Kerry Street. The nearest school is Sunnyside Elementary School that is adjacent to the east of the Project site. The school parking lot is located to the east of the Project site eastern boundary and school buildings are located behind the parking area.

Existing Ambient Noise Levels

To identify the existing ambient noise levels in the Project area, noise level measurements were taken on the Project site on December 9 and 10, 2025. Figure NOI-1 shows the location of the noise measurements. As shown on Table N-2, the average daily noise levels in the Project area were 66.8 to 69.8 Community Noise Equivalent Level (CNEL). Traffic noise from SR-22 is the dominant source of ambient noise in the vicinity of the Project site.

Table N-2: 24-Hour Ambient Noise Level Measurements

Location Number	Location Description	Daytime Noise Levels[1] (dBA L_{eq})	Evening Noise Levels[2] (dBA L_{eq})	Nighttime Noise Levels[3] (dBA L_{eq})	Average Daily Noise Levels (dBA CNEL)
LT-1	9822 Russell Avenue, Garden Grove. On the northwest corner of the Project site, on a tree. Approximately 30 feet from the Kerry Street centerline, 45 feet from the Russell Avenue centerline, and 940 feet from the SR-22 centerline.	54.6-61.9	57.7-58.7	54.3-64.0	66.8
LT-2	9822 Russell Avenue, Garden Grove. Near the southeast corner of the Project site, on a light pole. Approximately 780 feet from the SR-22 centerline.	56.8-63.8	59.7-62.7	59.4-66.8	69.8

Source: Noise and Vibration Impact Analysis, Appendix I

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

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

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

CNEL = Community Noise Equivalent Level

L_{eq} = equivalent continuous sound level

dBA = A-weighted decibels

SR-22 = California State Route 22

9822 Russell Avenue, Garden Grove

Figure NOI-1: Noise Measurement Locations

Map Date: 2/2/2026
Data Sources: LSA, 1/26/2026

RE Consulting

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?

Less than Significant Impact

Construction

Construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. The results of the CalEEMod for the proposed Project indicate that, during the demolition phase the acoustical equivalent traffic volume would be 1,765 passenger car equivalent vehicles (Appendix I). Based on the Orange County Highway Design Manual (County of Orange 2005), the traffic volume on residential collector streets such as Russell Avenue, assumed to be the main construction access, is between 1,200 and 6,000 vehicles (average of 3,600 vehicles). Noise and Vibration Impact Analysis determined that when adding 1,765 to the existing average daily trips, the increase is 1.8 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high noise levels. Construction is expected to occur in the following stages: demolition, site preparation, grading, building construction, architectural coating, paving. Noise levels generated by heavy construction equipment can range from approximately 76 dBA to 87 dBA when measured at 50 feet, as shown on Table N-3.

Table N-3: Construction Equipment Reference Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 ft[2]
Auger Drill Rig	20	84
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 ft[2]
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Source: Noise and Vibration Impact Analysis, Appendix I.

The construction noise from the proposed Project would occur over an approximate 11-month period and would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. Also, per GGMC Section 8.47.060(d), construction activities are limited to occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. No construction or repair work shall be permitted on Sundays or federal holidays. The proposed Project's construction activities would occur pursuant to these regulations, as ensured through the permitting process.

Construction equipment was analyzed based on being placed in the middle of the Project site, per the FTA Manual for a General Assessment, and is based on the rationale that mobile equipment would likely move around the entire Project site in a typical workday. As such, the middle of Project site would provide the acoustical average noise level created over a typical workday. However, to provide a conservative analysis, all equipment was analyzed as if operating simultaneously, instead of just the two nosiest pieces of equipment as recommended by the FTA Manual.

Table N-4 identifies the nearest sensitive uses to the Project site and their distances from the center of construction activities and the composite noise levels that do not consider intervening topography or barriers. As shown, construction noise at the closest residences and adjacent school would range from 76 to 79 dBA Leq, which would not exceed the 80 dBA Leq threshold during the daytime for residential uses. These noise levels would only occur when all construction equipment is operating simultaneously and, therefore, are conservative in nature. As construction noise at sensitive receiver would not exceed the 80 dBA Leq threshold, impacts would be less than significant, and no mitigation measures are required.

Table N-4: Project Construction Noise Levels at Sensitive Receivers

Receptor (Location)	Composite Noise Level (dBA L_{eq}) at 50 ft[1]	Distance (ft)	Composite Noise Level (dBA L_{eq})
Residential Uses (North)	87	160	76
School (East)		175	76
Residential Uses/School (South)		120	79
Residential Uses (West)		220	74

Source: Noise and Vibration Impact Analysis, Appendix I.
Note: The assessment distance is the distance from the center of construction activities to the property line of the surrounding uses.

Operation

Exterior Noise. As detailed in Table N-1, the existing ambient noise at the Project site is 66.8 dBA CNEL near the northwestern boundary of the site and 69.8 dBA CNEL near the southeastern boundary of the site. Traffic noise from SR-22 is the dominant source of noise in the vicinity of the Project site. The main amenity areas where residents would spend time include the common open space recreation area near the eastern edge of the Project site as well as the ground-level patios of the proposed townhomes. The Project includes 6-foot-high

CMU walls along the south and east site boundaries. Based on the distance of SR-22 to the Project site, a 6-foot-high wall is expected to provide an approximately 5 dBA noise reduction, which would reduce levels at the exterior habitable areas to 64.8 dBA CNEL. This noise level is below the General Plan "normally acceptable" level of 65 dBA CNEL, and no noise reduction measures would be required.

Interior Noise. As described previously, the existing ambient noise is 69.8 dBA CNEL near the southern façade of the proposed building closest to SR-22. Based on the EPA's Protective Noise Levels (1974), with windows and doors open, interior noise levels at the units along the southern boundary would be 58 dBA (i.e., 70 dBA - 12 dBA = 58 dBA). In addition, with the proposed HVAC systems that allow window closed conditions, standard residential building construction, and standard windows with a minimum Sound Transmission Class 28, interior noise levels would be below 45 dBA CNEL (Appendix I). No additional reduction measures would be required.

Traffic Noise. As described in Section 17, *Transportation*, Table T-1, operation of the proposed Project would result in a reduction of 58 daily vehicle trips, with 26 fewer trips in the a.m. peak hour and 24 fewer trips in the p.m. peal hour. Thus, vehicular noise from the proposed Project would be less than what is generated by the existing use, and operational roadway noise impacts to the nearby sensitive receptors would not occur. No mitigation measures are required.

Onsite Noise. The Project would include ground-floor heating, ventilation, and air conditioning (HVAC) equipment that could operate 24 hours per day. The HVAC equipment would generate noise levels of approximately 66.5 dBA Leq at 5 ft based on previous measurements conducted for similar residential units (Appendix I). A group of four HVAC units would generate noise levels of approximately 72.5 dBA Leq at 5 ft. The nearest HVAC units to off-site sensitive uses would be approximately 68 feet from the residential property line to the west. Attenuating for distance would reduce the noise level by 22.7 dBA. Noise levels of 49.8 dBA generated from on-site HVAC units would not exceed the City's exterior daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise standards of 60 dBA and 55 dBA, respectively, for residential uses. All other sensitive receptors are farther from the proposed HVAC equipment. Additionally, noise levels to the south and east would be further reduced by the proposed six-foot-high CMU walls along the south and east site boundaries. Therefore, no off-site noise impacts from on-site HVAC equipment would occur. No mitigation measures are required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant with Mitigation Incorporated

Construction

Construction activities associated with the proposed Project would require the operation of off-road equipment and trucks that are known sources of vibration. Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance.

Since neither the GGMC nor the General Plan provides a quantifiable vibration threshold, guidance from the *Transportation and Construction Vibration Guidance Manual*, prepared by Caltrans, has been utilized. The Caltrans guidance provides thresholds for building damage, where transient vibration sources up to 0.30 inch per second peak particle velocity (PPV) is considered safe for older residential structures, such as those near

the Project site. Also, this Caltrans guidance identifies human response, where transient vibration sources become distinctly perceptible at 0.04 root-mean-square (RMS) in/sec. Vibration levels calculated in RMS are best for characterizing human response to building vibration, and vibration level in PPV is best for characterizing the potential for damage.

A range of vibration is generated by construction equipment. As shown in Table N-5, the PPV and RMS vibration levels at 25 feet from bulldozers and other heavy-tracked construction equipment (expected to be used for this Project) generate approximately 0.089 in/sec PPV or 0.062 in/sec RMS of ground-borne vibration.

Table N-5: Vibration Source Levels for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	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[1]	**0.089**	**0.062**
Caisson Drilling	0.089	0.062
Loaded Trucks (Dumpers/Tenders)[1]	**0.076**	**0.053**
Jackhammer	0.035	0.025
Small Bulldozer[1]	**0.003**	**0.002**

[1] Equipment shown in **bold** is expected to be representative of the equipment used on site.
Source: Noise and Vibration Impact Analysis, Appendix I.

The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings, and the Project construction boundary. The closest structures to construction activities are the residential uses to south, which are approximately 10 feet from the property line. The vibration levels generated by large bulldozers and other large equipment would generate ground-borne vibration levels of up to 0.352 in/sec PPV at 10 feet from the closest structures to the south of the Project site, as shown on Table N-6.

Table N-6: Potential Construction Vibration Damage at Nearest Receptor

Receptor (Location)	Reference Vibration Level (in/sec PPV) at 25 ft[1]	Distance (ft)[2]	Vibration Level (in/sec PPV)
Residential Uses (North)	0.089	75	0.017
School (East)	0.089	65	0.021
Residential Uses (South)	0.089	10	0.352
	0.089	20[3]	0.124
	0.003	10	0.012
Residential Uses (West)	0.089	50	0.027

[1] This 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 to surrounding structures.
[3] A distance of 20 feet from the perimeter of large equipment construction activity to the nearest structure to the south would apply with the implementation of Mitigation Measure NOI-1.
Source: Noise and Vibration Impact Analysis, Appendix I.

Therefore, Mitigation Measure NOI-1, has been included to restrict the use of large construction equipment such as large bulldozers within 10 feet of the southern property line, which would result in a 20 foot setback from the closest structures to the south and would reduce vibration levels to 0.124 in/sec PPV, which is below the 0.3 in/sec PPV threshold. Vibration levels at all other buildings would be lower. With the implementation of Mitigation Measure NOI-1, construction would not exceed the vibration damage threshold, and impacts would be less than significant.

In addition, vibration levels would approach 0.011 in/sec RMS at the closest receptors, as shown in Table N-7, and would not exceed the annoyance threshold of 0.04 in/sec RMS. Therefore, impacts related to construction vibration annoyance would be less than significant.

Table N-7: Vibration Annoyance from Construction at Nearest Receptor

Receptor (Location)	Reference Vibration Level (in/sec RMS) at 25 ft[1]	Distance (ft)[2]	Vibration Level (in/sec RMS)
Residential Uses (North)	0.062	180	0.007
School (East)		240	0.005
Residential Uses (South)		125	0.011
Residential Uses (West)		225	0.006

[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 the nearest buildings of surrounding uses.
Source: Noise and Vibration Impact Analysis, Appendix I.

Operation

Operation of the proposed residential uses would include heavy trucks for residents moving in and out of the units and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, as shown on Table N-5, vibration levels from loaded trucks generate 0.076 inch per second PPV. Truck movements on site would be travelling at very low speed, so it is expected that truck vibration at nearby sensitive receptors would be less than 0.076 inch per second PPV, which is less than the older residential structure damage threshold of 0.3 inch per second PPV threshold. Further, structures greater than 20 feet from the roadways would experience vibration levels below the most conservative standard of 0.12 in/sec PPV. Therefore, operational vibration impacts would be less than significant. No mitigation measures are required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project site is not located within an airport land use plan or within 2 miles of an airport. The closest air facility is the Los Alamitos Joint Forces Training Base, located approximately 5 miles northwest of the Project site. The closest public airports to the Project site include the Fullerton Municipal Airport that is approximately 7 miles to the north of the site and John Wayne Airport, which is located over 7.75 miles to the southeast of the Project site. Therefore, the Project would not result in excessive noise levels related to airports, and no impacts would occur. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulation and City Condition of Approval would reduce potential impacts related to noise.

COA: Construction Noise. Project construction plans and specifications shall detail that construction activities shall occur in compliance with GGMC Section 8.47.060(d), which states that it shall be unlawful for any person within a residential area, or within a radius of 500 feet therefrom, to operate equipment or perform any construction or repair work on buildings, structures, or projects, including construction-related vehicles arriving, idling, or being loaded/unloaded at or near a construction site, or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device outside of the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. No construction or repair work shall be permitted on Sundays or federal holidays.

Mitigation Measures

Mitigation Measure NOI-1: Construction Vibration. Prior to issuance of demolition or grading permits, the Community Development Director, or designee, shall verify that the construction plans require that the construction contractor restrict the use of heavy construction equipment (i.e., greater than 80,000 pounds), vibratory rollers, large loaded trucks, and large dozers within 10 feet of the southern property line. Instead, smaller, rubber-tired bulldozers (less than 80,000 pounds) shall be used within this area during Project construction to reduce vibration levels.

References

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Focused General Plan Update and Zoning Amendments Draft Environmental Impact Report (SCH# 2021060714), 2021. Accessed: https://ceqanet.opr.ca.gov/Project/2021060714

City of Garden Grove Municipal Code. Accessed at: https://ecode360.com/GA4928/home

Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual, September 2018. Accessed: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Noise and Vibration Impact Analysis prepared by LSA Associates, Inc., 2026 (Appendix I)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
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?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

Less than Significant Impact. The Project site is currently developed with a church, preschool, wireless facility, and daycare facility and does not currently provide for housing; however, the site is within a developed area that includes residential, school, and church uses.

The California Department of Finance data from May 2025 states that there are 171,492 residents and 50,273 housing units within the City. Of these housing units, 97.1 percent of them were occupied. The different types of housing units in the City consist of 57 percent single-family residences, 9 percent were single-family attached residences, 8.5 percent were residences within buildings containing between 2 and 4 units, 22.5 percent were in buildings containing 5 or more units, and 3.1 percent consist of mobile homes. The average household size within the City is 3.47 persons per household. The Southern California Association of Governments (SCAG) Connect SoCal demographics and growth forecasts project that the number of households in the City's will grow to 53,600 by the year 2035 and 57,700 by the year 2050. This is an increase of 3,327 households by 2035, which is a 6.6 percent increase over the 2025 number of housing units in the City. The increase in households by 2050 is 7,427, which is a 14.8 percent increase over the 2025 number of housing units in the City.

Construction

Construction of the Project would provide short-term jobs over an approximately 11-month period. Many of the construction jobs would be temporary and would be specific to the Project. This workforce would include a variety of craftspeople, such as cement finishers, iron workers, welders, carpenters, electricians, painters, and laborers. It is anticipated that the Project-related construction labor force would already be located in the region, travel from one construction project to another as needed, and workers would not be expected to relocate their places of residence as a consequence of working on the Project. Therefore, the Project would not be expected to induce substantial population growth or demand for housing through increased construction employment. No mitigation measures are required.

Operation

The Project would redevelop the site with 26 residential townhomes. Based on the existing California Department of Finance estimated average household size of 3.47 persons per household, the 26 residences

that would be developed on the Project site would result in approximately 90 residents at full capacity. Assuming all residents on the Project site are new to Garden Grove, this would equate to an increase of 0.05 percent of the City's existing population. In addition, the 26 townhomes would result in a 0.05 percent increase in the number of housing units within the City; and would be 0.4 percent of the SCAG projected increase in households within the City by year 2050. This is not considered a substantial increase due to the limited number of residents and residential units that would result from the Project, which is located within an urban area. Additionally, the City's Regional Housing Needs Assessment (RHNA) for the 2021–2029 planning period identifies that the City's future housing need is 19,168 residential units, and 8,936 of which are for above moderate income households. The Project would be within the City's future housing need for the 2021–2029 planning period.

Indirect growth is related to the expansion of infrastructure, such as water, sewer, drainage, or street systems that would serve areas beyond the proposed development. The Project would be served by the existing infrastructure that currently serves the site and that the new townhomes would connect to. Therefore, the Project would not result in inducement of substantial population growth, either directly or indirectly, and impacts would be less than significant. No mitigation measures are required.

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

No Impact. The Project site is currently developed with a church, preschool, and daycare facility that is relocating. No housing currently exists on the Project site, and displacement of housing and people would not occur as a result of Project implementation. Therefore, the proposed Project would not result in an impact related to the displacement of housing or people, and no mitigation would be required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

There are no existing regulations and/or Conditions of Approval related to population and housing that are applicable to the Project.

Mitigation Measures

No mitigation measures related to population and housing are required.

References

State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2020-2025. Sacramento, California, May 2025 Accessed: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/

Southern California Association of Governments Connect SoCal (2020–2050 Regional Transportation Plan/Sustainable Communities Strategy) Demographics and Growth Forecast Technical Report, 2024. Accessed: https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf

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

a) Result in substantial adverse physical impacts associated with the provision of 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?

Less than Significant Impact. The Orange County Fire Authority (OCFA) provides fire suppression, emergency medical, rescue and fire prevention, and hazardous materials coordination services for the City of Garden Grove through a contract for services. There are seven City owned Fire Stations within the City. There are four City fire stations within 2.6 miles of the site, which are listed below in order of distance from the Project site:

- Fire Station 80, located at 14162 Forsyth Lane, which is 1.1 miles from the Project site
- Fire Station 81, located at 11261 Acacia Parkway, which is 1.8 miles from the Project site
- Fire Station 82, located at 11805 Gilbert Street, which is 2.3 miles from the Project site
- Fire Station 83, located at 12132 Trask Avenue, which is 2.6 miles from the Project site

The proposed Project would remove the existing church, preschool, and daycare facilities and develop 26 new townhome residences on the site. The new townhomes would include new fire prevention infrastructure pursuant to current code requirements. The City has adopted the California Fire Code (Title 24, Part 9 of the California Code of Regulations) in GGMC Section 18.16.04, which regulates new structures related to safety

provisions, emergency planning, fire-resistant construction, fire protection systems, and appropriate emergency access throughout the site. The Project's adherence to the existing fire code requirements has been verified by the OCFA as part of the City's regular permitting process and the City's standard Condition of Approval to comply with the OCFA Master Plan would be included.

As the site and surrounding areas are currently served by Fire Station 80 that is 1.1 miles from the site, and there are three other City fire stations within 2.6 miles of the site, OCFA would be able to continue to provide fire services to the Project site and surrounding area from the existing fire stations. Additionally, the existing onsite structures are aged and not consistent with current fire code standards. The Project would provide new construction onsite that would provide improved fire safety compared to the existing structures. Also, the proposed Project would result in a limited number of residents on the site. The 90 residents at full capacity would be a maximum increase of 0.05 percent of the City's population. The new construction and limited increase in population within 2.6 miles of four fire stations would not result in the need for new or physically altered fire facilities that could cause significant environmental impacts. Therefore, the Project would result in less than significant impacts related to fire protection services and no mitigation measures are required.

Police protection?

Less than Significant Impact. The Garden Grove Police Department provides police services to the Project area. The Police Department headquarters is located approximately 1.8 miles from the Project site. In 2025, the City had 183 sworn officers and 71 non-sworn Police Department employees, which equates to 1.07 sworn officers per 1,000 residents. In addition, the City's 2025-27 Biannual Budget states that the average response times for calls for service is 5:09 minutes.

Construction

Crime and safety issues during Project construction may include: theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism, which can result in the need for police services. However, the site would have security fencing during construction activities, and onsite materials would be either locked or kept in secure locations and would be limited based on the materials needed during each phase of construction, which would reduce these concerns during the approximately 11-month construction period to a less than significant level. In addition, new construction activity on the Project site would not allow the site to be used for trespassing; and would therefore eliminate the existing security concern on the Project site. No mitigation measures are required.

Operation

Redevelopment of the Project site would result in approximately 90 residents onsite, which would replace the church, preschool, and daycare employees and patrons. The 90 residents at full capacity would be a maximum increase of 0.05 percent of the City's population. Based on the City's existing ratio of 1.07 sworn officers per 1,000 residents, the 90 residents at full capacity would result in the need for 0.10 percent of a new officer. During operation, the Project is anticipated to generate a typical range of police service calls, such as vehicle break-ins, residential thefts and disturbances, and vandalism. Security concerns would be addressed by providing low-intensity security lighting and visibility in common areas. Also, pursuant to the City's project review process, the Police Department has reviewed the Project's site plans and has not identified security concerns.

Due to the redevelopment nature of the Project site that is 1.8 miles from the Police Department headquarters, within an area that is already served, the increase would not be significant when compared to the current

demand levels and law enforcement personnel are anticipated to be able to respond in a timely manner to emergency calls from the Project site. Overall, the needs for law enforcement services from the proposed Project would result in 0.10 percent of an officer that would not require construction or expansion of the Police Department facilities. Thus, the Project would not result in the need for new or physically altered police protection facilities, and substantial adverse physical impacts associated with the provision of new or expanded facilities would be less than significant. No mitigation measures are required.

Schools?

Less than Significant Impact. The Project area is in the Garden Grove Unified School District (GGUSD), which serves a 28-square mile area with 65 schools. The following schools identified by the GGUSD website school locator would service students at the Project site:

- Sunnyside Elementary School, at 9972 Russell Avenue; adjacent to the east of the Project site
- Jordan Intermediate, at 9821 Woodbury Road; 0.8 mile south of the Project site
- Bolsa Grande High School, at 9401 Westminster Avenue; 1.6 miles south of the Project site

Development of the Project would generate a new student population on the Project site, who would generally (unless homeschooled or attending a private school) attend one of the three schools listed above. This would generate additional students to be served at local public schools. However, the need for additional school facilities is addressed through compliance with school impact fee assessment SB 50 (Chapter 407 of Statutes of 1998). SB 50 sets forth a state school facilities construction program, in which school districts (including GGUSD) collect fees at the time of issuance of building permits for development projects. In addition, pursuant to Government Code Section 65995 payment of the school impact fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities from the increase in students related to the project would be less than significant with the Government Code required fee payments. Consistent with the requirement, the payment of school fees is listed below as an existing regulation that reduces potential impacts. No mitigation measures are required.

Parks

Less than Significant Impact. The City currently maintains 13 parks and uses five public schools as additional park facilities through joint-use agreements with the GGUSD, totaling 157.1 acres of parkland throughout the City. The General Plan Parks, Recreation, and Open Space Element requires the provision of two acres of parkland per 1,000 residents.

The Project would develop 26 residential townhomes on the Project site, which would result in a new resident population of approximately 90 persons that would utilize park and recreational facilities. The Project includes a 3,695 square foot central active open space recreation area with shade structures, BBQs with buffet countertop, picnic seating, community garden with raised planter boxes, open turf, bench seating, shade trees. The Project also includes 2,901 square feet of passive open space area and 2,106 square feet of private yards. The new resident population would likely utilize the onsite open space and recreation areas; in addition to other existing nearby park facilities.

GGMC Sections 9.40.140 and 9.44.030 require that two acres of City parks per 1,000 persons existing within the City be dedicated to local parks. As described previously, the Project is estimated to result in 90 new residents at full occupancy. This would create a City requirement for dedication of 0.18 acre (7,840 square feet) of parkland and/or payment of park fees pursuant Section 9.40.140 of the GGMC, which provides an in-lieu fee

and parkland dedication requirements for development projects. Because the Project would provide both onsite recreation facilities and payment of the in-lieu fee for park and recreation, impacts related to the expanded need for parks due to the project would be less than significant. No mitigation measures are required.

Other public facilities?

Less than Significant Impact. Other public facilities include libraries. The County of Orange operates three public libraries in the City, which include:

- Garden Grove Main Library, located at 11200 Stanford Avenue, located 1.9 miles from the Project site;
- Garden Grove/Chapman Library, located at 9182 Chapman Avenue, located 2.4 miles from the Project site; and
- Garden Grove Tibor Rubin Library, located at 11962 Bailey Street, located 5.7 miles from the Project site.

Library service needs are changing with increasing resources available online and the availability of high-speed internet services. Therefore, the 26 new townhomes on the Project site do not necessarily have an incremental increased need for library resources/services or square footage of library space. The Project would install internet infrastructure and a majority of the residential units would likely have internet service and a majority of residents are likely to have cell phone service with internet access, which provides access to many of the same resources provided by the library and would limit the increased need for library services and resources. Therefore, the Project would result in less than significant impacts related to library services. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations and Condition of Approval would reduce potential impacts related to public services.

COA: Fire Master Plan: As listed previously in Section 9, *Hazards and Hazardous Materials*.

Schools Development Impact Fee: The Project will be required to pay applicable development fees levied by the Garden Grove Unified School District pursuant to the School Facilities Act (Senate Bill [SB] 50, Stats. 1998, c.407) to offset these impacts on school facilities resulting from new development.

Park and Recreation Impact Fee: The Project will be required to pay applicable City development impact fees for park and recreational facilities pursuant to GGMC 9.44.030 In-Lieu Park Fees, which are imposed on each development project to offset the cost of providing increased park and recreation facilities.

Mitigation Measures

No mitigation measures related to public services are required.

References

California Department of Education. Accessed: https://www.cde.ca.gov/ds/

City of Garden Grove Biannual Budget 2025-27. Accessed: https://city-garden-grove-ca-cleardoc.cleargov.com/13525/448903/d

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Municipal Code. Accessed at: https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

City of Garden Grove Website Parks and Facilities Page. Accessed: https://ggcity.org/community-services/parks-and-facilities

Garden Grove Police Department. Accessed: https://ggcity.org/police

Garden Grove Fire Station Locations: Accessed: https://ggcity.org/orange-county-fire-authority/garden-grove-fire-station-locations

Garden Grove Unified School District Accessed: https://www.ggusd.us/

Orange County Fire Authority Website. Accessed: https://ocfa.org/

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION.				
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?	☐	☐	☒	☐

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Less than Significant Impact. The Project would develop 26 townhome residences on the Project site, which would result in a resident population of approximately 90 people that would utilize park and recreational facilities. The Project includes a 3,695 square foot central active open space recreation area with shade structures, BBQs with buffet countertop, picnic seating, community garden with raised planter boxes, open turf, bench seating, shade trees. The Project also includes 2,901 square feet of passive open space area and 2,106 square feet of private yards. Based on the limited number of residents at full capacity of the Project and the provision of onsite recreation area, the Project is not anticipated to increase the use of existing parks and recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated.

In addition, as described previously, the GGMC Section 9.40.140 requires payment of park fees prior to the issuance of a building permit. By payment of the required park fees, the Project would provide funding to offset any increased usage at park and recreation facilities. Overall, the Project would not result in substantial physical deterioration of park and recreation facilities, and impacts would be less than significant. No mitigation measures are required.

b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. As described previously, the Project includes a 3,695 square foot central active open space recreation area with shade structures, BBQs with buffet countertop, picnic seating, community garden with raised planter boxes, open turf, bench seating, shade trees. The Project also includes 2,901 square feet of passive open space area and 2,106 square feet of private yards. The impacts of development of these recreational amenities are evaluated herein as part of the impacts of the Project as a whole and are analyzed throughout the various sections of this document. For example, activities such as excavation, grading, and construction, as required for the recreational components of this Project, are analyzed in the Air Quality, Greenhouse Gas Emissions, Noise, and Transportation sections.

In addition, while the Project would contribute park development fees pursuant to GGMC Section 9.40.140 to be used towards the future expansion or maintenance parks and recreational facilities, these fees are standard with every residential development, and the Project would not require the construction or expansion of other recreational facilities that might have an adverse physical effect on the environment. As a result, impacts would be less than significant. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulation and City Condition of Approval would reduce potential impacts related to recreation.

Park and Recreation Impact Fee: Listed previously in Section 15, *Public Services*.

Mitigation Measures

No mitigation measures related to recreation are required.

References

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Municipal Code. Accessed at: https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

City of Garden Grove Website Parks and Facilities Page. Accessed: https://ggcity.org/community-services/parks-and-facilities

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
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 LOS Screening Analysis (Appendix B) and the Vehicle Miles Traveled (VMT) Screening Analysis (Appendix J).

Traffic Thresholds

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 CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB 743 specified that the criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based Level of Service (LOS) could no longer be considered an indicator of a significant impact on the environment.

VMT Threshold. CEQA Guidelines Section 15064.3 - Determining the Significance of Transportation Impacts, provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. The City of Garden Grove Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment provides screening thresholds to identify projects that would have a less than significant impact on VMT, which include being within a Transit Priority Area, being within a low traffic analysis zone (TAZ) or being a local-serving project.

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

Less than Significant Impact

Construction

Construction activities associated with the Project would generate vehicular trips from construction workers traveling to and from the Project site and delivery and hauling of construction supplies to, and debris and recyclable solid waste from, the Project site. The CalEEMod modeling completed for the Project (Appendix A)

details that the demolition and grading construction phases would generate the most vehicular trips. The demolition phase would generate 44 one-way haul trips and 13 one-way worker trips per day (114 total trips per day). The grading phase would generate 31 one-way haul trips and 13 one-way worker trips per day (88 total trips per day). As detailed in Table 2, *Construction Schedule*, demolition and grading would occur over 24 working days. The building construction phase is the longest and is anticipated by CalEEMod to generate 44 round trips per day. The construction related trips would generally travel from SR-22 to Trask Avenue and/or Brookhurst Street to access the Project site during the approximate 11-month construction period.

As detailed below, operation of the existing church, preschool, and daycare on the site results in 219 daily trips. The 114 trips per day during maximum construction activities would be much less than operation of the existing site uses. Therefore, construction of the Project would not result in an increase in traffic on roadway facilities, such that it could conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant. No mitigation measures are required.

Operation

Roadway Facilities. The proposed Project would remove the existing church, preschool, wireless facility, and daycare uses and redevelop the Project site with 26 new residential townhomes, open space, and parking facilities. A Project trip generation was prepared using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 12th Edition (2025. As shown in Table T-1, the existing church, preschool, and daycare generate 219 daily trips with 37 a.m. and 38 p.m. and the proposed 26 residential townhomes are forecast to generate 161 daily vehicle trips, 11 a.m. and 14 p.m. peak hour vehicle trips. This would result in an overall reduction of 58 daily trips with 26 fewer trips in the a.m. peak hour and 24 fewer trips in the p.m. peak hour. Thus, the Project would not generate an increase in traffic on roadway facilities that could conflict with a program, plan, ordinance, or policy addressing the circulation system. No mitigation measures are required.

Table T-1: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use		**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Trip Rates									
560 Church[1]		1000 Sq. Ft. GFA	6.78	0.23	0.14	0.37	0.18	0.25	0.43
565 Day Care Center[2]		1000 Sq. Ft. GFA	39.3	5.77	5.11	10.88	5.05	5.7	10.75
220 Multifamily Housing (Low-Rise)[3]		Dwelling Units	6.21	0.1	0.31	0.41	0.32	0.2	0.52
Project Trip Generation									
Existing Uses Trip Generation									
Church[1]	15.59	1000 Sq. Ft. GFA	106	4	2	6	3	4	7
Day Care Center[2]	2.88	1000 Sq. Ft. GFA	113	16	15	31	15	16	31
Proposed Project Trip Generation									
Multifamily Housing (Low-Rise)[3]	26	Dwelling Units	161	3	8	11	9	5	14
Total Existing Trip Generation			**219**	**20**	**17**	**37**	**18**	**20**	**38**
Total Project Trip Generation			**161**	**3**	**8**	**11**	**9**	**5**	**14**
Total Net New Trip Generation			**-58**	**-17**	**-9**	**-26**	**-9**	**-15**	**-24**

Source: Level of Service Screening Analysis, Appendix B.

[1]Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 560 - Church (Average Rate)

[2]Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 565 - Day Care Center (Average Rate)

[3]Institute of Transportation Engineers, Trip Generation Manual, 12th Edition, 2025. Land Use Code 220 - Multifamily Housing (Low-Rise) (Average Rate)

Pedestrian Facilities. A sidewalk currently exists on Russell Avenue along the Project site frontage. The proposed Project would redevelop and improve the existing sidewalk and provide for pedestrian circulation by constructing new onsite sidewalks and pathways that would circle the site, provide pedestrian access to the onsite recreation and open space areas, and connect to the sidewalk along Russell Avenue and the new sidewalk along Kerry Street that would be installed by the Project. The Project would provide onsite pedestrian circulation to facilitate use of the existing and new offsite sidewalks; and therefore, impacts related to pedestrian facilities or a conflict with a program, plan, ordinance, or policy related to pedestrian facilities would not occur. No mitigation measures are required.

Bicycle Facilities. There are no existing bicycle lanes located on the streets surrounding the Project site. The closest existing bicycle lanes are Class II Bike lanes, which are on-street striped lanes, that are located on Brookhurst Street. The Project includes installation of a bicycle rack for community use to encourage bicycle transportation. As a result, the Project would not result in impacts related to bicycle circulation, and no mitigation measures are required.

Transit Service. Transit service is provided along Brookhurst Street by Orange County Transportation Authority (OCTA) Bus Route 35 with service every 30 minutes during the peak hour. The existing bus services would provide efficient transportation to and from the site for residents and visitors and have the potential to reduce vehicle miles traveled. Impacts related to transit services would not occur from implementation of the proposed Project, and no mitigation measures are required.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The City of Garden Grove Traffic Impact Analysis Guidelines for VMT provides screening thresholds to identify projects that would have a less than significant impact on VMT, which include meeting specific criteria within a Transit Priority Area, being within a low TAZ or being a local serving retail project. The Project's consistency with these screening thresholds is detailed below.

Transit Priority Area. The City's VMT screening thresholds identify that projects in a Transit Priority Area (TPA), which are locations within 0.5 mile of an existing major transit stop (an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods) or an existing stop along a high-quality transit corridor would have a less than significant impact on VMT. However, the City guidelines state that the project may not meet the screening threshold if the following project or location specific criteria are not met:

- Has a Floor Area Ration (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate or high-income residential units.

The Project site is located approximately 327 feet (0.062 miles) from Bus Stop ID 2187 and 500 feet (0.095 miles) from Bus Stop ID 2208, both served by Orange County Transportation Authority (OCTA) Route 35. This route does not operate at 20-minute or better headways during weekday peak periods (6:00–9:00 a.m. and 3:00–7:00 p.m.). Thus, the area does not qualify as a "major transit stop," and therefore, does not meet the definition of a TPA. As such, the Project does not meet the TPA screening criteria.

Low VMT Traffic Analysis Zone. The City's TIA Guidelines use the Orange County Traffic Analysis Model (OCTAM) travel demand forecasting model to determine if a project is located in a low VMT generating area. Per these guidelines, projects located in Zone 1 areas, Lower Than VMT Threshold, can be presumed not to have a significant VMT impact and can be screened from VMT analysis.

As shown in Figure T-1, *Low VMT Generating Traffic Analysis Zones*, the Project site is located in Zone 2 that has been identified as having a lower than County average VMT. Therefore, the site is in an area that has a lower than County average VMT but higher than the City of Garden Grove's VMT Threshold and cannot be assumed to be less than significant. Therefore, the Project does not meet the Low VMT Area screening criteria.

Project Type Screening. The City of Garden Grove Traffic Impact Analysis Guidelines identify specific land uses that qualify for Project Type Screening. Residential development is not included among the listed project types. Therefore, the proposed residential townhome Project does not qualify for Screening Criteria 3.

However, the Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA* (original Dec. 2018; updated Jan. 22, 2019) states (p. 17) 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."

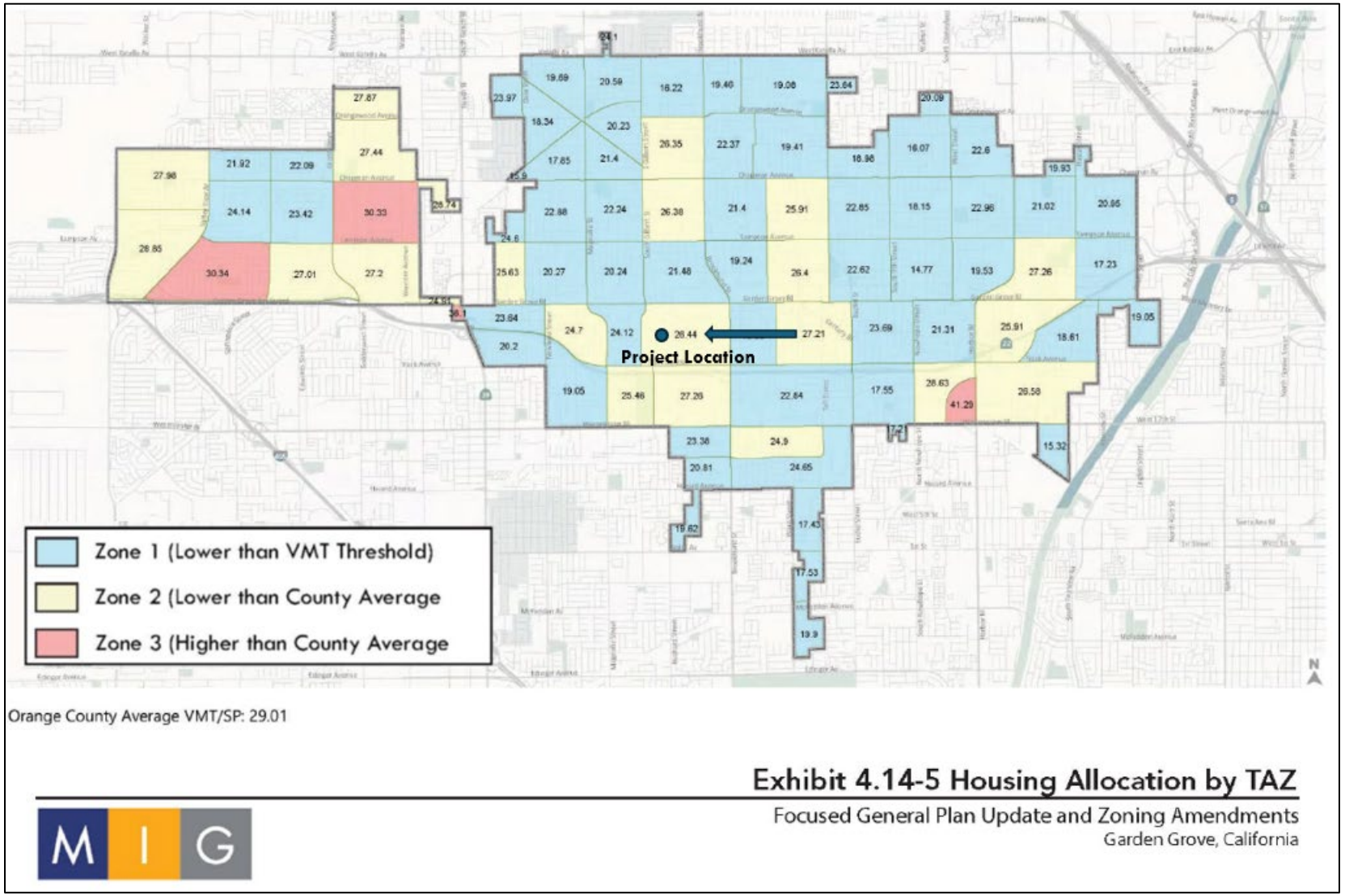
As shown in Table T-1, the Project would result in 58 fewer daily trips than the existing uses on the Project site. Table T-2 shows that the reduction in VMT from the reduction in trips would be 446 in the Project's TAZ. Therefore, the proposed Project would replace existing VMT-generating land uses and result in a net decrease in VMT. As a result of this reduction, the Project would have a less than significant impact related to VMT and no mitigation is required.

Table T-2: Project Change in VMT

	Trips Generated	TAZ Average Trip Length	Project Site Total VMT	TAZ 539 Total VMT
With Existing Use	219	7.70	1,685	124,325
With Proposed Project	161	7.70	1,239	123,879
Net VMT			**-446**	**-446**

Source: VMT Screening Analysis, Appendix J

Figure T-1: Low VMT Generating Traffic Analysis Zones



c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The Project includes development of new townhome residences, open space recreation, and circulation and parking. The Project includes only residential uses and does not include any incompatible uses, such as farm equipment.

The proposed Project area would be accessed from a driveway on Russell Avenue. Onsite vehicular circulation would be provided by a drive isle that would be a minimum of 25-feet in width, as shown on Figure 6, *Conceptual Site Plan*. Pedestrian circulation would be provided by an onsite sidewalk that would link the proposed recreation and open space areas, the residences, and the offsite sidewalk along Russell Avenue.

The Project would also not increase any hazards related to a design feature. The City's construction permitting process includes review of Project plans to ensure that no potentially hazardous transportation design features would be introduced by the Project. The onsite circulation plan has been reviewed by the City Public Works Department Engineering Division and the OCFA, which verified that the fire engine accessibility and turn around area is provided to the fire code standards. As a result, impacts related to vehicular circulation design features would be less than significant, and no mitigation measures are required.

d) Result in inadequate emergency access?

Less than Significant Impact

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of new driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Russell Avenue or Kerry Street. Any temporary lane closures needed for utility connections or driveway access construction would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014), as incorporated into a Traffic Management Plan for the Project that the City requires for receipt of construction permits. The Traffic Management Plan would include designated haul routes, temporary traffic control devices, travel time restrictions, and other elements determined through the construction review and permitting process by the City's Public Works Division that would ensure that substantial traffic queuing along Russell Avenue would not occur, and that all construction equipment would be staged on site. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level. No mitigation measures are required.

Operation

Operation of the Project would also not result in inadequate emergency access. The Project driveway and internal access has been reviewed by OCFA and meets the City's design standards and provides adequate turning space for passenger cars, fire trucks, and delivery trucks. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The City 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), included in GGMC Chapter 18.04

and as amended in Chapter 18.16. As a result, impacts related to inadequate emergency access would not occur. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

There are no existing regulations and/or Conditions of Approval related to transportation that are applicable to the Project.

Mitigation Measures

No mitigation measures related to transportation are required.

References

Governor's Office of Planning and on Evaluating Transportation Impacts in CEQA. Accessed:
Research (OPR) Technical Advisory https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Municipal Code. Accessed at:
https://library.qcode.us/lib/garden_grove_ca/pub/municipal_code

Level of Service (LOS) Screening Analysis, prepared by EPD Solutions, Inc., Appendix B.

Vehicle Miles Traveled (VMT) Screening Analysis, prepared by EPD Solutions, Inc., Appendix J.

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

The discussion below is based on the Cultural Resources Study, which is included as Appendix C and tribal consultation pursuant to SB 18 and AB 52, as detailed below.

SB 18

As the Project includes a General Plan Amendment to change the land use designation of the Project site, the Project is required to comply with Senate Bill (SB) 18 (California Government Code Section 65352.3), which sets forth requirements for local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) to aid in the protection of tribal cultural resources. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning to protect or mitigate impacts on tribal cultural resources.

AB 52

The Project is required to comply with AB 52 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources (TCRs)." 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."

Tribal Consultation
A record search of the NAHC Sacred Lands File (SLF) was completed for the proposed Project on December 1, 2025; the results of which were negative. The NAHC provided a list of 11 tribes who may have knowledge of cultural resources in the Project area. The City also has a list of 4 tribes that have previously requested AB 52 notifications, three of which were also listed by the NAHC.

In compliance with the SB 18 and AB 52 requirements, the City sent letters on December 18, 2025 to the following 12 tribes:

- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California
- Juaneno Band of Mission Indians Acjachemen Nation – Belardes
- Juaneno Band of Mission Indians Acjachemen Nation – 84A
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla
- Soboba Band of Luiseno Indians
- Torres Martinez Desert Cahuilla Indians
- Gabrielino/Tongva Nation
- Gabrielino/Tongva Tribe

The following three tribes responded to the letters: the Gabrieleno Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California, Pala Band of Mission Indians, as detailed below:

- The Gabrieleno Band of Mission Indians - Kizh Nation submitted a request to consult on January 9, 2026. In response, on January 12, 2026 a consultation with the City and Tribe was scheduled for February 10, 2026. However, the City received an e-mail from the Tribe on February 9, 2026, which stated that the Tribe had conflicts and had to cancel scheduled consultation, and offered to conduct an e-mail consultation instead for which the City agreed and requested the Tribe provide information regarding cultural affiliation to Project site vicinity. The e-mail consultation from the Tribe was received on February 17, 2026, which consisted of the Tribe's requested mitigation measures. City staff reviewed the recommended mitigation and emailed redlined revisions providing enhanced CEQA mitigation language to the Tribe on February 18, 2026. The Tribe agreed to the revised mitigation language with minor text amendments (Mitigation Measures TCR-1 through TCR-3, provided below). The City officially closed consultation on March 27, 2026.
- The Gabrielino Tongva Indians of California provided an email response to the City on January 5, 2026 stating that they are in receipt of the Project information and have no comment.
- The Pala Band of Mission Indians emailed a letter on January 21, 2026 stating that the Project is not within the boundaries of the recognized Pala Indian Reservation or the Traditional Use Area (TUA) and declines consultation. However, the letter states that the Project is located close to the Reservation and would like to be maintained on the Project notification list.

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)?

No Impact. As described previously in Section 5, *Cultural Resources*, the Project site does not contain any known CEQA historical resources. Section 5, *Cultural Resources*, details that the buildings on the Project site were determined not to be eligible for the NRHP or the CRHR. In addition, a Sacred Lands File search from the Native American Heritage Commission indicated negative results for the presence of sacred sites. Therefore, the proposed redevelopment of the site for residential uses would not result in impacts to resources that are 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). No impacts would occur and no mitigation is required.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant with Mitigation Incorporated. The Project site is developed with buildings and paved areas and has been previously disturbed by previous agricultural and development activities. As described previously in Section 5, *Cultural Resources*, the SCCIC records search results indicated that no prehistoric resources have ever been identified within the vicinity of the Project. The Preliminary Geotechnical Investigation Report (Appendix D) identifies that the Project site has approximately two feet of compacted artificial fill, but thicker deposits of fill are anticipated under existing building pads.

The Project involves grading and excavation of the upper two feet (or one foot below footings) of soil that would be removed and recompacted. Thus, Project excavation would not be likely to encroach into non-fill soils or soils not previously disturbed by agricultural activity. Thus, impacts related to tribal cultural resources are not anticipated to occur.

The information provided by Gabrieleno Band of Mission Indians – Kizh Nation does not provide substantial evidence that the proposed Project may have a significant impact on tribal cultural resources. However, due to regional historic activities by the Gabrielenos and the potential for unanticipated discoveries of resources, measures to provide tribal monitoring of ground disturbing activities and measures to implement should a potential tribal cultural resource be inadvertently unearthed from site soils during the Project's ground disturbing activities have been included. With implementation of Mitigation Measures TCR-1 through TCR-3 potential impacts related to tribal cultural resources would be less than significant.

Additionally, 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, with implementation of Mitigation Measures TCR-1 through TCR-3 and the existing regulations, impacts to tribal cultural resources would be less than significant.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulation would reduce potential impacts related to tribal cultural resources.

Human Remains: California Health and Safety Code Section 7050.5, detailed previously in Section 5, *Cultural Resources*.

Mitigation Measures

Mitigation Measure TCR-1: Native American Monitoring.

A. The Project plans, specifications, and grading permits shall state that the Project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh). 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 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 City 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 shall 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 shall 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 shall be provided to the Project applicant/City 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/City 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/City that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact any TCRs.

Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects.

A. Upon discovery of any TCRs, the Kizh monitor shall notify the City and Project applicant and 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 shall recover and retain all discovered TCRs in the form and/or manner the Kizh deems appropriate.

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.

References

California State Parks Office of Historic Preservation. California Register of Historical Resources. https://ohp.parks.ca.gov/ListedResources/

City of Garden Grove General Plan. Accessed at: https://ggcity.org/planning/general-plan

City of Garden Grove Focused General Plan Update and Zoning Amendments Draft Environmental Impact Report (SCH# 2021060714), 2021. Accessed: https://ceqanet.opr.ca.gov/Project/2021060714

Cultural Resources Study for the 9822 Russell Avenue Project, 2025. Prepared by BFSA Environmental Services. (Appendix C)

National Park Service. National Register of Historic Places
https://www.nps.gov/subjects/nationalregister/database-research.htm

Phase I Environmental Site Assessment, prepared by Partner Engineering and Science, Inc, 2025 (Appendix E).

Preliminary Geotechnical Investigation Report, 2025. Prepared by Alubs & Associates, Inc. (Appendix D).

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

a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact

Water Infrastructure. The Project site is developed with a church, preschool, and daycare, and connected to the existing water infrastructure system. Existing 6-inch water lines are located in both Russell Avenue and Kerry Street. The Project would redevelop the site, install new onsite water lines, and connect to the existing 6-inch water line in Russell Avenue that would provide water supplies to the proposed Project. The proposed onsite water line would loop through the site conveying water supplies to each of the proposed townhomes.

As described below in Response b), the Project would result in a water demand increase of approximately 12,780 gallons per day. The City has provided a Will-Serve Letter verifying that this demand is available and would be accommodated by the existing water lines. Thus, the Project would receive water supplies through the existing water line in the Russell Avenue right-of-way, which would not require expansion to serve the

Project. Although installation of onsite water lines would be required to support the new development, no extensions or expansions to the water pipelines supplying the Project site would be required. The necessary installation of the onsite water supply lines is included as part of the Project and would not result in any physical environmental effects beyond those identified in other sections of this IS/MND. For example, construction emissions for excavation and installation of the water infrastructure is included in Section 3, *Air Quality* and Section 8, *Greenhouse Gas Emissions*. Therefore, the Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant. No mitigation measures are required.

Wastewater Infrastructure. The existing onsite sewer infrastructure is connected to the 8-inch sewer line in Russell Avenue. The Project would remove the existing onsite sewer lines and install new onsite sewer lines that would connect to existing sewer line within the Russell Avenue right-of-way. The City has provided a Will-Serve letter verifying that the existing sewer lines have adequate capacity to serve the proposed residential townhomes. The construction activities related to installation of the onsite sewer infrastructure that would serve the proposed Project, are included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this IS/MND. For example, construction emissions for excavation and installation of the sewer infrastructure is included in Section 3, *Air Quality* and Section 8, *Greenhouse Gas Emissions*, and noise volumes from these activities are evaluated in Section 13, *Noise*.

In addition, as detailed below in Response C, the existing wastewater treatment plant that serves the Project site has capacity to accommodate the wastewater flow from the Project. As the proposed Project includes facilities to serve the proposed development and the wastewater treatment plant has capacity to serve the site, the proposed Project would not result in the need for construction of other new wastewater facilities or expansions, the construction of which could cause significant environmental effects. Therefore, impacts would be less than significant, and no mitigation measures are required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. The City's Urban Water Management Plan (UWMP) describes that the City relies on 50 percent groundwater from 13 wells in the Orange County groundwater basin and 50 percent imported water from the Metropolitan Water District of Southern California. The UWMP projects that by 2045, the population of the City would increase by 4.8 percent and the City's water supply portfolio will change to approximately 85 percent groundwater and 15 percent imported water, but that the City could purchase more imported water as needed. The City also operates eight storage and distribution reservoirs at five sites with a combined capacity of 53 million gallons (MG). The storage volume is the equivalent of more than two days average use and is more than adequate for peaking demands and firefighting needs (UWMP 2020).

The 2020 UWMP describes that City's water use in 2020 was comprised of 64.8 percent residential, 24.5 percent commercial/industrial/institutional, 2.9 percent large landscape/irrigation, and 7.7 percent other uses; and that water demand is likely to increase 2.8 percent over the next 5 years. The 2020 UWMP shows that the City's water demand in 2020 was 21,979 acre-feet yearly (AFY) and is projected to increase to 22,792 AFY by 2045. This is an increase of 813 AFY and assumes continued operation of the existing church, preschool, and daycare on the Project site.

The Project would redevelop the site with 26 residential units, which would house approximately 90 residents, as described in Section 13, *Population and Housing*. The 90 new onsite residents would be 2.6 percent of the

2020 UWMP anticipated increase in population between 2025 and 2045 (UWMP Table 3-2). The Project would result in a water demand of approximately 12,780 gallons per day (14.3 AFY) using the 2020 baseline water use rate of 142 GPCD in the 2020 UWMP, which is a conservative assumption as the City used 93 GPCD in 2020 and this doesn't account for the reduction of water from removal of the existing church, preschool, and daycare.

This represents 1.8 percent of the City's anticipated increase in water demand between 2020 and 2045, not including the reduction of water from removal of the existing church, preschool, and daycare. Therefore, the City has sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years. In addition, the Project would implement a number of water conservation measures as required by CALGreen and Title 24 requirements, such as use of water efficient plumbing fixtures and irrigation systems, routing runoff to landscape areas, and provision of separate meters for each residence. The Project would also comply with AB 1881 landscaping requirements (included in the GGMC in Section 9.12.040.085 and pursuant to the Title 24 regulations in GGMC Section 18.04.010, which the City includes as a Condition of Approval. Overall, impacts related to water resources would be less than significant. No mitigation measures are required.

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?

Less than Significant Impact. The existing church, preschool, and daycare is connected to the existing sewer system and generates wastewater. The proposed residential townhomes would generate new wastewater, which would be conveyed through existing sewer facilities to OCSD's wastewater treatment plant No. 1 in Fountain Valley that has a capacity of 320 million gallons per day (MGD). In 2024-25, the estimated average daily flow received at the wastewater treatment plant No. 1 was 116 MGD. Thus, the plant has an additional capacity of 204 MGD.

As detailed previously, the Project site currently generates wastewater that is treated by the OCSD facilities. The Project is anticipated to generate a water demand of 12,780 gallons per day, some of which would be used for landscaping and other uses and would not enter the sewer system. However, assuming the maximum water from the Project becomes wastewater, the 12,780 gallons would be accommodated by the OCSD's excess capacity. Therefore, impacts related to the wastewater treatment system would be less than significant. No mitigation measures are required.

d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. In 2024, most of the solid waste from the City, which was disposed of in landfills, went to either the Olinda Alpha Sanitary Landfill or the Frank Bowerman Sanitary Landfill (Calrecycle 2025).

The Olinda Alpha Sanitary Landfill is permitted to accept 8,000 tons per day of solid waste and is permitted to operate through 2036. In August 2025 the maximum tonnage accepted was 3,841 tons, which is 4,159 tons less than the allowable tonnage. The Frank Bowerman Sanitary Landfill is permitted to accept 11,500 tons per day of solid waste and is permitted to operate through 2053. In August 2025, the landfill had a maximum daily tonnage of 8,952; thus, having an average daily additional capacity of 2,548 tons per day (Calrecycle SWIS 2025).

Construction
Project construction would generate solid waste for landfill disposal in the form of demolition debris from the removal of the existing buildings, pavement, and infrastructure that would be removed from the site. Construction waste in the form of packaging, used construction materials, and remnant materials would also be generated by construction of the proposed Project. The demolition of the existing buildings and hardscape is anticipated to amount to 3,527 tons of debris (Appendix A). This would result in an average of 176.35 tons of solid waste demolition debris per day for 20 days (Table 2, Construction Schedule). However, the CALGreen 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. Therefore, the demolition activities (that would generate the most construction solid waste) would generate approximately 61.72 tons of solid waste per day.

As described above, the Olinda Alpha Sanitary Landfill has an average daily additional capacity of 4,159 tons per day and the Frank Bowerman Sanitary Landfill has an average daily additional capacity of 2,548 tons per day (Calrecycle 2025), which is sufficient permitted capacity to accommodate the additional 61.72 tons of demolition waste per day for 20 days that would result from the Project. Thus, construction impacts related to landfill capacity would be less than significant, and no mitigation measures are required.

Operation
The CalEEMod modeling identified that the proposed 26 townhomes and 90 new residents on the site would generate 19 tons of solid waste per year (Appendix A), which equates to 731 pounds of solid waste per week. However, based on the current recycling requirements, which require diversion of 75 percent of solid waste away from landfills, the Project would result in an increase of 182.75 pounds of solid waste per week being disposed of in landfills. Thus, it is anticipated that the increase of solid waste landfill disposal from operation of the Project would be approximately 182.75 pounds per week. As described above, the Olinda Alpha Sanitary Landfill has an average daily additional capacity of 4,159 tons per day and the Frank Bowerman Sanitary Landfill has an average daily additional capacity of 2,548 tons per day (Calrecycle 2025), which is sufficient permitted capacity to accommodate the additional solid waste disposal needs that would result from the Project, and impacts related to landfill capacity would be less than significant. No mitigation measures are required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The proposed Project would result in new development that would generate an increased amount of solid waste. All solid waste-generating activities within the City is subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code and the GGMC Section 18.60.040 that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all state regulations, as ensured through the City's development permitting process. Therefore, the proposed Project would comply with all solid waste statutes and regulations; and impacts would not occur. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing regulations and Conditions of Approval would reduce potential impacts related to utilities and service systems.

COA AB 1881 Landscaping. As listed previously in Section 8, *Greenhouse Gas Emissions*.

Construction Waste. The GGMC Section 18.60.040, Minimum Construction and Demolition Waste Diversion Requirements. Construction plans and specifications shall implement reuse, recycling, and/or diversion of the minimum percentage amount of designated recyclable and reusable materials as set forth by the CALGreen (Part 11 of Title 24, California Code of Regulations).

CALGreen Compliance. As listed previously in Section 6, *Energy*.

Mitigation Measures

No mitigation measures related to utilities and service systems are required.

References

Air Quality, Energy, and Greenhouse Gas Impact Analysis, prepared by EPD Solutions, Inc., Appendix A

CalReycyle Jurisdiction Disposal and Beneficial Reuse by Destination (Calrecycle 2025). Accessed at: https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial

CalRecycle. 2025b. SWIS Facility/Site Inspection Details – Olinda Alpha Landfill (30-AB-0035). [online]: https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Details/349413. Accessed October 2025.

CalRecycle. 2025a. SWIS Facility/Site Inspection Details – Frank R. Bowerman Sanitary LF (30-AB-0360). [online]: https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Details/349346?siteID=2103. Accessed October 2025.

Calrecycle Solid Waste Information System (SWIS) Database (Calrecycle SWIS 2023). Accessed: https://calrecycle.ca.gov/SWFacilities/

City of Garden Grove 2020 Urban Water Management Plan. Accessed: https://ggcity.org/sites/default/files/Garden%20Grove%202020%20UWMP%20FINAL-2021.06.29.pdf

Orange County Sanitation Districts, Regional Sewer Service, Facts, and Key Statistics. Accessed: https://www.ocsan.gov/regional-sewer-service/

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRES. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project site is developed and within an urbanized area of the City of Garden Grove. The Project site is surrounded by developed and urban areas. The Project site is not adjacent to any wildland areas. According to the CAL FIRE Hazard Severity Zone map, the Project site is not within a fire hazard zone. Also, as described previously, the proposed Project area would be accessed from a driveway on Russell Avenue. Permitting of the driveways and onsite circulation would provide adequate and safe circulation to, from, and through the Project site that would provide appropriate emergency access and evacuation routes. Because the Project is required to comply with the California Fire Code (included as GGMC Chapter 18.04 and as amended in GGMC Chapter 18.16), as verified through OCFA review. Also, the City's standard Condition of Approval to comply with the OCFA Master Plan would be included. Therefore, potential impacts related to impairment of an emergency response or evacuation plan would not occur. No mitigation measures are required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project site is largely developed and within an urbanized residential area of the City of Garden Grove. The Project site is surrounded by developed and urban areas. The Project site is not adjacent to any wildland areas, and as determined by the CAL FIRE Hazard Severity Zone map, the Project site is not within a fire hazard zone. In addition, the Project site is flat and within a flat area. The site is adjacent to two roadways, parking lots for the adjacent school and church and existing residences. There are no factors on or adjacent to the Project site that would exacerbate wildfire risks. Thus, no impacts related to other factors that would expose persons on site to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur from the Project. No mitigation measures are required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As described previously, the Project site is developed and within a developed and urban area that is not within a wildfire hazard zone. The Project does not include any infrastructure that would exacerbate fire risks. In addition, the Project would provide internal circulation and fire suppression facilities (e.g., hydrants and sprinklers) that conform to the California Fire Code requirements, included in GGMC Chapter 18.04 and as amended in GGMC Chapter 18.16, as verified through the City's permitting process. Therefore, impacts related to infrastructure that could exacerbate fire risks would not occur with the proposed Project. No mitigation measures are required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. As described previously, the Project site is developed and within a developed and urban area that is not 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. The Project would install onsite drainage that would convey stormwater above the 85th percentile to the proposed bioretention treatment devices prior to infiltration into site soils. Therefore, impacts related to flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would not occur from the proposed Project. No mitigation measures are required.

Existing Regulations and/or Conditions of Approval that Reduce Potential Impacts

The following existing Condition of Approval related to wildfire are applicable to the Project.

COA: Fire Master Plan: As listed previously in Section 9, *Hazards and Hazardous Materials*.

Mitigation Measures

No mitigation measures related to wildfire are required.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2023. Fire Hazard Severity Zone Map. Accessed: https://forestwatch.maps.arcgis.com/apps/Styler/index.html?appid=5e96315793d445419b6c96f89ce5d153

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 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?	☐	☒	☐	☐

a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant with Mitigation Incorporated. As described in Section 4, *Biological Resources*, the Project site is developed, and no special status vegetation types or wildlife species are located on or adjacent to the Project site. No potentially suitable habitat for special status plant or wildlife species is on or adjacent to the site. Additionally, the Project site does not include riparian, wetland, grassland, woodland, or other natural areas. The Project site contains a limited number of ornamental trees that could be used for nesting by common bird species that are protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515 during the avian nesting and breeding season. The provisions of the MBTA prohibit disturbing or destroying active nests, which would be implemented through the City's development permitting process, and impacts would be less than significant.

Also, as described Section 5, *Cultural Resources*, and Section 18, *Tribal Cultural Resources*, the Project site does not contain any historic resources, archaeological resources, or known tribal cultural resources. The site has been disturbed from past agricultural and development activities and contains approximately two feet of compacted artificial fill, but thicker deposits of fill are anticipated under existing building pads. Further, the SCCIC records search results indicated that no prehistoric resources have ever been identified within the

vicinity of the Project. As a result, the potential for archaeological impacts are less than significant and Mitigation Measure PAL-1 has been included to ensure that any inadvertent discovery of potential paleontological resources during ground-disturbing activities would be less than significant. Likewise, impacts related to tribal cultural resources are not anticipated to occur; however, due to regional tribal historic activities Mitigation Measures TCR-1 through TCR-3 have been included to ensure that impacts would not result. Thus, impacts would be less than significant with mitigation incorporated.

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)?

Less than Significant with Mitigation Incorporated. 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 developed and is located in an urban area. The Project would redevelop the site for residential uses. The proposed residential townhomes are consistent with the surrounding residential and school and church development near the Project site. Much of the anticipated future development in the Project area consists of redevelopment of single and multi-family residences with additional residences.

The City has identified four development projects that are in the general vicinity of the Project site that may have the potential to result in cumulative effects, as they would increase the density of existing uses in the Project vicinity. These projects include the following:

- Residential Townhome Project: 30 residential townhomes (13252 Brookhurst Street) approximately 0.3-mile northeast of the Project site.
- Multiple-Family Residential Apartment Complex: 98 apartment units (9891 Garden Grove Boulevard), approximately 0.5-mile north of the Project site.
- Multiple-Family Residential Apartment Building: 94 apartment units (12854 Brookhurst Way) approximately 0.6-mile north of the Project site.
- Mixed-use: 9,786 square feet of retail space, 9,270 square feet of medical space, and 52 apartment units (10201 Garden Grove Boulevard) approximately 0.7-mile north of the Project site.

The cumulative projects involve redevelopment of parcels within the existing urban environment and are community type uses that include residences, retail, and medical uses. The proposed Project is consistent with

the community uses of each of the cumulative projects. The closest cumulative project is 0.3-mile northeast of the Project site. Due to this distance, cumulative construction noise, vibration, and vehicular trips would not cumulatively combine to be potentially significant.

As explained in Section 17, *Transportation*, the proposed Project would result in a reduction of daily and peak hour vehicular trips compared to the existing church, preschool, and daycare uses on the site, and it would not generate a cumulative transportation impact. Likewise, air quality emissions, greenhouse gas emissions, energy, and traffic noise from the Project would be less than that of the existing uses on the site and would not contribute to potential impacts from other development projects; and thus, would be less than cumulatively considerable.

All of the other 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 related to paleontological resources, construction vibration, and tribal cultural resources. In addition, the cumulative effect of the Project is limited, due to the small scale and redevelopment nature of the Project on land that has been previously disturbed and because it can be accommodated by the existing roadway system, public services, and utilities systems. Overall, impacts to environmental resources or issue areas would not be cumulatively considerable; and cumulative impacts would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation Incorporated. The Project proposes redevelopment of the Project site for residential townhome uses. As described previously, the Project site is within an urban area and surrounded by residential, church and school land uses. The Project would not consist of any use or any activities that would result in a substantial negative effect on persons in the vicinity. All resource topics associated with the proposed 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 mitigation measures related to paleontological resources, construction vibration, and tribal cultural resources; and existing laws and regulations that are required by the City. Therefore, the proposed Project would result in less than significant environmental effects on human beings directly and indirectly, with incorporation of mitigation.

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