

MAY 2026

FIRST & MOUNTAIN VIEW PROJECT

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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PREPARED FOR:

CITY OF SANTA ANA

PUBLIC REVIEW DRAFT
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First & Mountain View Project

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May 2026

JN 208279

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MITIGATED NEGATIVE DECLARATION AND TECHNICAL APPENDICES

The Notice of Intent (NOI), Mitigated Negative Declaration, Initial Study, and Technical Appendices are available for public review on the City's website:

https://www.santa-ana.org/1st-and-mountain-view-townhome-development/

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1.0 INTRODUCTION

The First & Mountain View Project (herein referenced as the "project") proposes to develop a residential community consisting of 61 for-sale townhome units with approximately 10,876 square feet of common open space and 136 parking spaces. The residential community would consist of nine separate three-story townhouse buildings (four-plex to ten-plex) totaling approximately 103,759 square feet in living area (excluding garages and open spaces). Additional details regarding the project are provided in Section 2.0, *Project Description*.

Following a preliminary review of the proposed project, the City of Santa Ana (City) has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study/Mitigated Negative Declaration addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with CEQA (Public Resources Code Sections 21000-21177) and pursuant to Section 15063 of Title 14 of the California Code of Regulations (CCR), the City of Santa Ana, acting in the capacity of Lead Agency, is required to undertake the preparation of an Initial Study to determine whether the project would have a significant environmental impact. If the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the project would not have a significant effect on the environment and shall prepare a Negative Declaration (or Mitigated Negative Declaration) for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Section 21080, Public Resources Code).

The environmental documentation, which is ultimately approved and/or certified by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

1.2 PURPOSE

CEQA Guidelines Section 15063 identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

1.3 CONSULTATION

Per CEQA Guidelines Section 21080.3, prior to determining whether a negative declaration or environmental impact report is required for a project, the Lead Agency (in this case, the City of Santa Ana) shall consult with all responsible agencies and trustee agencies. Prior to that required consultation, the lead agency may informally contact any of those

agencies to obtain any recommendations of those agencies on the environmental documentation to be prepared for the project. Following receipt of any written comments from those agencies, the City will consider their recommendations when formulating the preliminary findings. Following completion of this Initial Study, the City will initiate formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. The documents are available for review at the City of Santa Ana, Planning and Building Agency, 20 Civic Center Plaza, Santa Ana, California 92701.

- *City of Santa Ana General Plan* (last comprehensively updated in 2022). The *City of Santa Ana General Plan* (General Plan) is the principal long-range policy and planning document of Santa Ana. It provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the City through 2045. Informed by a comprehensive public engagement process, the General Plan establishes a shared vision of the community's aspirations as the world-class capital of Orange County that celebrates diversity, neighborhoods, and cultural heritage. The General Plan is meant to help every decision maker, stakeholder, business, and resident take the steps necessary to realize this vision. The General Plan includes the following elements: Community Element, Economic Prosperity Element, Mobility Element, Public Services Element, Conservation Element, Noise Element, Open Space Element, Safety Element, Land Use Element, Historic Preservation Element, Housing Element, and Urban Design Element.

- *Santa Ana Municipal Code* (codified through Ordinance No. NS-3081, current through Supplement 32, adopted June 17, 2025). The *Santa Ana Municipal Code* (Municipal Code) provides regulations for government administrative operations, construction, development, infrastructure, public safety, and business operations within the City. The Zoning Ordinance (Chapter 41 of the Municipal Code) is intended to serve the public health, safety, comfort, convenience and general welfare by establishing land use districts designed to obtain the physical, environmental, economic and social advantages resulting from planned use of land in accordance with the General Plan. The Zoning Ordinance provides a set of regulations which control permitted land uses, the density of development, the uses and locations of structures, the height of buildings and structures, the required amount of open space, the appearance of certain uses and structures, the areas and dimensions of sites, the location, size and illumination of signs and displays, requirements for off-street parking and off-street loading facilities, provisions for street dedications and improvements, standards for water efficient landscaping, and procedures for administering and amending such regulations and requirements.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of Santa Ana (City) is located in central Orange County, generally north of the San Diego Freeway (Interstate 405 [I-405]), south of the Garden Grove Freeway (State Route 22 [SR-22]), and west of the Costa Mesa Freeway (SR-55). The City is approximately 30 miles southeast of downtown Los Angeles; refer to Exhibit 2-1, *Regional Vicinity*. Santa Ana is surrounded by the cities of Orange and Garden Grove to the north, Tustin to the east, Costa Mesa and Irvine to the south, and Fountain Valley and Westminster to the west.

The proposed First & Mountain View Project (project) site is approximately 2.54 net acres (3.3 gross acres) in size. The site includes parcels located at 4320 West First Street (Assessor's Parcel Numbers [APNs] 188-021-11 and 188-021-12) and 201 South Mountain View Street (APN 188-021-10); together, the parcels are referred to as the project site; refer to Exhibit 2-2, *Site Vicinity*. Regional access to the project site is provided via SR-22, I-405, and Interstate 5 (I-5). Local access to the project site is provided via South Newhope Street, West First Street, and South Mountain View Street.

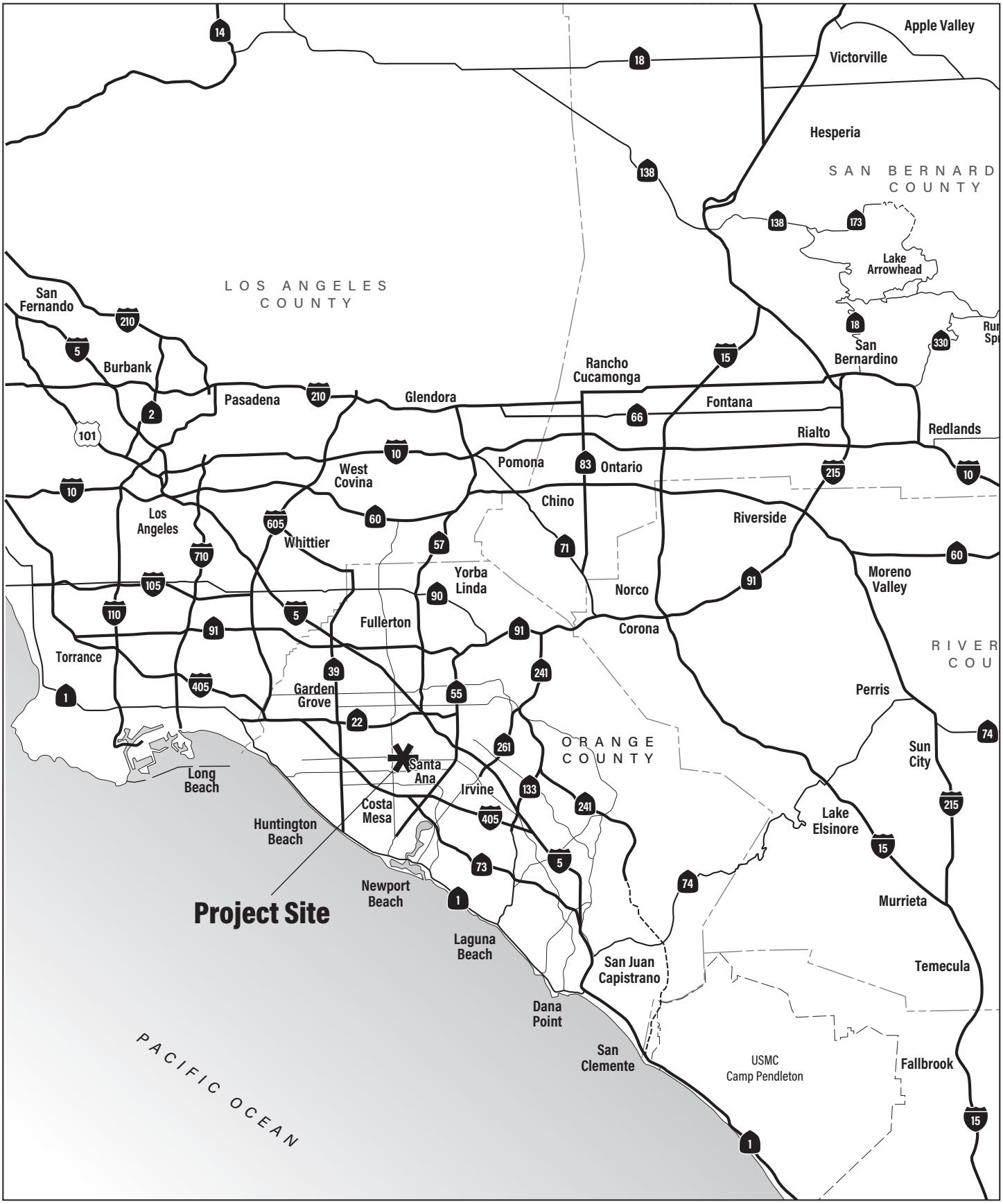
2.2 ENVIRONMENTAL SETTING

The project site is located within a highly developed and urbanized area of Santa Ana. The site is completely developed and disturbed and is vacant with no existing operations. An approximately 11,300-square foot single-story commercial/industrial building about 18 to 20 feet in height, constructed in 1977 and modified prior to 2005, is located in the southern portion of the site. The remainder of the site is fully paved with no other structures present. Concrete masonry unit walls surround the project perimeter on all sides. Minimal vegetation, including street trees and perimeter plantings along West First Street and South Mountain View Street, is present on-site. The site is accessible from South Mountain View Street via a driveway near the southwest corner of the site. Existing overhead powerlines are located off-site along West First Street and South Mountain View Street.

GENERAL PLAN LAND USE DESIGNATION AND ZONING

According to the *City of Santa Ana General Plan* (General Plan) Land Use Map, the site is designated General Commercial (GC) and Low-Medium Density Residential (LMR-11). The GC designation provides highly visible and accessible shopping opportunities along arterial corridors and supports the development and continued operation of recreational, cultural, entertainment, employment, and educational opportunities near established residential neighborhoods. The LMR-11 designation applies to residential areas suitable for multiple building types, including single-family detached homes, small-lot subdivisions, townhomes, duplexes, and mobile home parks. It has a maximum density of 11 dwellings per acre and typical maximum height of three stories.

Based on the *City of Santa Ana Zoning Map* (Zoning Map), the site is zoned General Commercial (C2) and Light Industrial (M1). The C2 district allows for a wide variety of businesses and uses but also includes specific regulations for development and operation. The M1 zone primarily accommodates light industrial uses including fabrication, manufacturing, assembly, or processing of already processed materials as well as industry-supporting activities.



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Regional Vicinity

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Exhibit 2-1



Source: Google Earth Pro, October 2025

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Site Vicinity

Exhibit 2-2

SURROUNDING LAND USES

Surrounding land uses include a mixture of residential and commercial uses. Specifically, land uses surrounding the project site include:

- *North:* West First Street is located immediately north. Further north of West First Street consists of single- and multi-family residential uses and commercial uses (e.g., restaurants, grocery stores, and retail). These areas are designated Medium Density Residential (MR-15) and LMR-11, and zoned C2 and Two Family Residential (R2).

- *East:* An existing multi-family residential community (Parkside Court Apartments) is located to the east. This area is designated LMR-11 and zoned Specific Development No. 32 (SD32).

- *South:* A public use (City of Santa Ana Public Works Department water reservoir) is located to the south. This area is designated LMR-11 and zoned Open Space Land (O); and

- *West:* South Mountain View Street is located immediately west. A vacant lot used by the City of Santa Ana Public Works Department for equipment storage is located further to the west. This area is designated GC and zoned C2 and M1.

2.3 BACKGROUND AND HISTORY

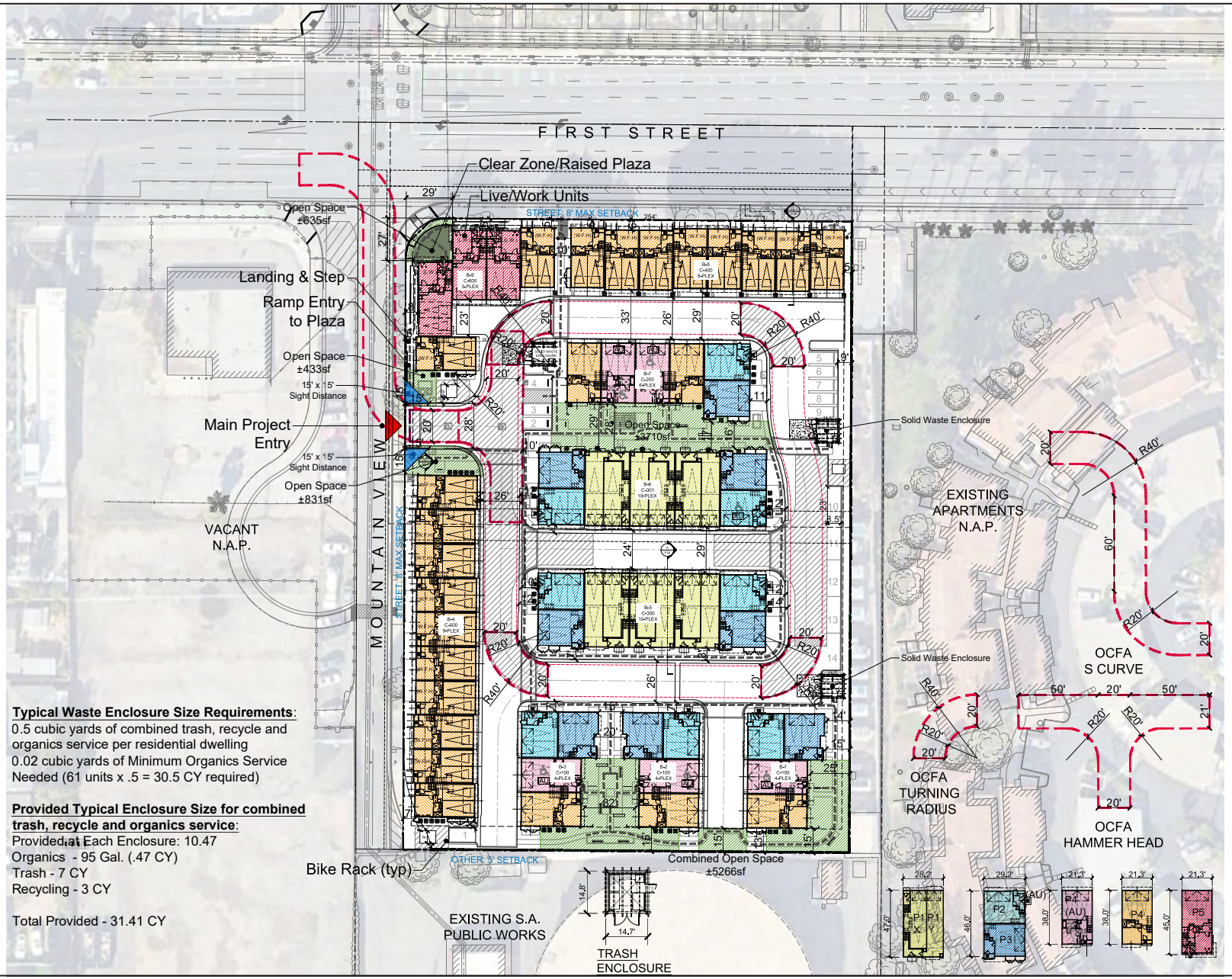
Based on historic aerials from 1953, the site was utilized for agricultural purposes.[1] Subsequently, the site was developed with a union hall in the northwest portion of the site in 1965; this structure was demolished in 1996. From 1977 to April 2025, the project site operated as a food truck commissary, allowing for the storage of commercial food trucks and necessary food preparation. The existing industrial/commercial building in the southern portion of the site previously supported the commissary operations and is now vacant. Overall, the site is vacant with no existing operations.

2.4 PROJECT CHARACTERISTICS

The project proposes to develop a residential community consisting of 61 for-sale townhome units with approximately 10,876 square feet of common open space and 136 parking spaces; refer to Exhibit 2-3, *Conceptual Site Plan*. The residential community would consist of nine separate three-story townhouse buildings (four-plex to ten-plex) totaling approximately 103,759 square feet in living area (excluding garages and open spaces). The 61 units would result in a density of approximately 24 dwelling unit per acre and consist of six two-bedroom units, 25 three-bedroom units, and 30 four-bedroom units. Among these units, six are designed as accessible units and three are designed as live/work units; refer to Table 2-1, *Proposed Townhome Units* and Exhibit 2-3. Five percent of the 61 proposed units (three units) would be designated as Very Low-Income units.

As shown on Exhibit 2-4, *Conceptual Building Section*, each proposed building would be three stories with a maximum building height of approximately 39.5 feet. Each of the nine townhouse buildings would include two-car garages at the ground level (tuck-under building design) and four to ten residential units above. As detailed in Table 2-1, the proposed units would offer a variety of floor plans with sizes ranging between 1,318 to 2,154 square feet with an average unit size of 1,701 square feet. Each unit would contain full kitchens, bedrooms, bathrooms, in-unit storage, and open/common (living) areas. The project would be all-electric with no natural gas services provided for the buildings or project-related site amenities.

[1] NETR Online Historic Aerials, *Historic Aerials*, https://www.historicaerials.com/viewer, accessed July 10, 2025.



Source: KTGY Architecture + Planning, October 2025

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Conceptual Site Plan

Exhibit 2-3

Among the nine buildings, six different types of building configurations are proposed; refer to Exhibit 2-4, *Conceptual Building Section*, and Exhibits 2-5a, *Building Elevations – C-100*, through *2-5f, Building Elevations – C-600*. As shown on Exhibit 2-4 and Exhibits 2-5a through 2-5f, the contemporary Spanish style development would include painted stucco, bay windows, metal railings, and stone veneers, among others, and the building exteriors would be painted in a variety of neutral/warm tones (white stucco walls, red roof tiles, brown beams, blue and plum colored doors, and Spanish tiles).

Table 2-1
Proposed Townhome Units

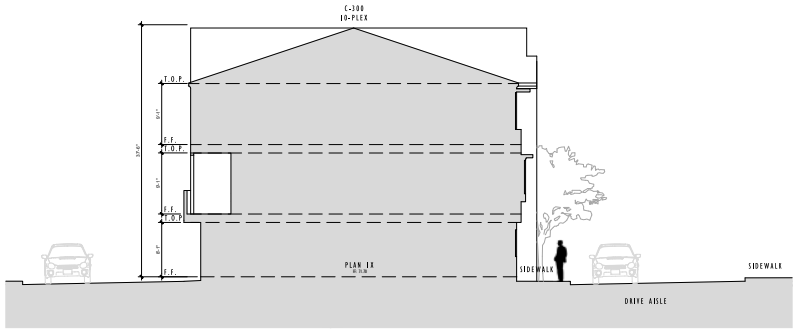
Quantity	Floor Plan	Floor Area	Number of Bedrooms/ Bathrooms	Garage Space Configuration	Garage Size
6	Plan 1X	1,318 SF	3bd / 3ba	2-car tandem	535 SF
6	Plan 1Y	1,471 SF	2bd / 2.5ba	2-car tandem	565 SF
2	Plan 2 (AU)	1,448 SF	3bd / 2.5ba	2-car side-by-side	551 SF
6	Plan 2	1,448 SF	3bd / 2.5ba	2-car side-by-side	551 SF
8	Plan 3	1,452 SF	3bd / 2.5ba	2-car side-by-side	559 SF
5	Plan 4	1,894 SF	4bd / 3.5ba	2-car side-by-side	482 SF
5	Plan 4 (AU)	1,913 SF	4bd / 3.5ba	2-car side-by-side	460 SF
20	Plan 4X	1,917 SF	4bd / 3.5ba	2-car side-by-side	482 SF
2	Plan 5 (L/W)	2,148 SF	3bd / 2.5ba	2-car side-by-side	521 SF
1	Plan 5X (L/W)	2,154 SF	3bd / 2.5ba	2-car side-by-side	581 SF
TOTAL: 61 UNITS, 103,759 SF; AVERAGE: 1,701 SF/UNIT				**TOTAL: 122 GARAGE SPACES, 31,061 SF**	
Notes: AU = accessible units; L/W = live/work units; SF = square feet; bd = bedroom; ba = bathroom					
Source: KTGY Group, Inc., May 2025					

SITE ACCESS AND PARKING

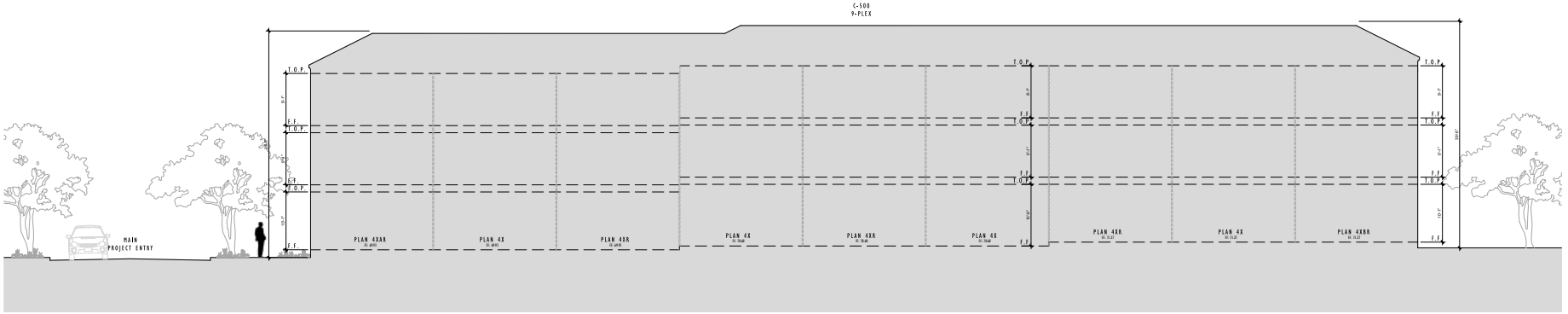
Primary pedestrian access would be provided along West First Street from one lockable entry/exit tubular steel gate and one lockable exit-only tubular steel gate. Vehicular access would be provided via a driveway along South Mountain View Street. Internal drive aisles would provide access to each building. The proposed 20-foot wide ingress/egress access point from South Mountain View Street the roadway would widen into a 28-foot-wide, two-way turn drive aisle into the site's internal circulation network, where drive aisles range in width from 20 to 33 feet to provide adequate space for fire access.

The project would provide a total of 136 parking spaces, including 122 covered garage parking spaces and 14 open/guest surface parking spaces. Bicycle storage spaces would be provided near the driveway entrance along South Mountain View Street as well as near the central open space area.

Under existing conditions, the segment of South Mountain View Street that bounds the project site to the west terminates to the south in a cul-de-sac; this cul-de-sac provides access to the City of Santa Ana Public Works Department water reservoir to the south and the City yard to the west of the site. The project proposes to improve the existing South Mountain View Street cul-de-sac. Specifically, in coordination with the City, a portion of the existing right-of-way would be vacated to reduce the length of the cul-de-sac. An approximately 412-square foot portion of the existing right-of-way would be transferred to the project site. The City and project applicant have agreed to improve South Mountain View Street to the full extent of the new right-of-way; refer to Exhibit 2-3.



INTERIOR BUILDING SECTION A-
FACING EAST



STREET - FACING BUILDING SECTION B (ALONG MOUNTAIN VIEW ST) -
FACING EAST

Source: KTGY Architecture + Planning, July 2025

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Conceptual Building Sections

Exhibit 2-4

MATERIALS LEGEND

1 Stucco	11 Fiber Cement Board Trim at Bay Window (W.O.)	21 Sectional Metal Garage Door
2 Spanish 'S' Roof Tile	12 Stucco Wing Wall	22 Metal Utility Door
3 Stucco Recess /Reveal at Windows/Doors (2" TYP.)	13 Concrete Paver Caps at Shelf To Slope (W.O.)	
4 Gable End Faux Vent Recess	14 Accent Ceramic Tile Surround	
5 Stucco Finial /Faux Chimney	15 Metal Railing (W.O.)	
6 Decorative Fiberglass Entry Door	16 Bay Window	
7 Vinyl Windows	17 Decorative Stucco/Metal Scupper at Decks (W.O.)	
8 Sloped Stucco Sill	18 Stucco Furring	
9 Stucco Decorative Foam Corbel	19 Metal Awning	
10 Stucco Decorative Foam Eave	20 Decorative Exterior Lights & Raised Number Address	



Right Elevation



Rear Elevation



Left Elevation



Front Elevation

Source: KTGY Architecture + Planning, July 2025

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FIRST & MOUNTAIN VIEW PROJECT
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Building Elevations – C-100

Exhibit 2-5a

MATERIALS LEGEND

1 Stucco
2 Spanish 'S' Roof Tile
3 Stucco Recess /Reveal at Windows/Doors (2" TYP.)
4 Gable End Faux Vent Recess
5 Stucco Finial /Faux Chimney
6 Decorative Fiberglass Entry Door
7 Vinyl Windows
8 Sloped Stucco Sill
9 Stucco Decorative Foam Corbel
10 Stucco Decorative Foam Eave
11 Fiber Cement Board Trim at Bay Window (W.O.)
12 Stucco Wing Wall
13 Concrete Paver Caps at Shelf To Slope (W.O.)
14 Accent Ceramic Tile Surround
15 Metal Railing (W.O.)
16 Bay Window
17 Decorative Stucco/Metal Scupper at Decks (W.O.)
18 Stucco Furring
19 Metal Awning
20 Decorative Exterior Lights & Raised Number Address
21 Sectional Metal Garage Door
22 Metal Utility Door



Left Elevation



Front Elevation

Source: KTGY Architecture + Planning, July 2025

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FIRST & MOUNTAIN VIEW PROJECT
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Building Elevations – C-200

Exhibit 2-5b

MATERIALS LEGEND

1 Stucco
2 Spanish 'S' Roof Tile
3 Stucco Recess /Reveal at Windows/Doors (2" TYP.)
4 Gable End Faux Vent Recess
5 Stucco Finial /Faux Chimney
6 Decorative Fiberglass Entry Door
7 Vinyl Windows
8 Sloped Stucco Sill
9 Stucco Decorative Foam Corbel
10 Stucco Decorative Foam Eave
11 Fiber Cement Board Trim at Bay Window (W.O.)
12 Stucco Wing Wall
13 Concrete Paver Caps at Shelf To Slope (W.O.)
14 Accent Ceramic Tile Surround
15 Metal Railing (W.O.)
16 Bay Window
17 Decorative Stucco/Metal Scupper at Decks (W.O.)
18 Stucco Furring
19 Metal Awning
20 Decorative Exterior Lights & Raised Number Address
21 Sectional Metal Garage Door
22 Metal Utility Door



Left Elevation



Front Elevation

Source: KTGY Architecture + Planning, July 2025

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FIRST & MOUNTAIN VIEW PROJECT
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Building Elevations – C-300

Exhibit 2-5c

MATERIALS LEGEND

1 Stucco
2 Spanish 'S' Roof Tile
3 Stucco Recess /Reveal at Windows/Doors (2" TYP.)
4 Gable End Faux Vent Recess
5 Stucco Finial /Faux Chimney
6 Decorative Fiberglass Entry Door
7 Vinyl Windows
8 Sloped Stucco Sill
9 Stucco Decorative Foam Corbel
10 Stucco Decorative Foam Eave
11 Fiber Cement Board Trim at Bay Window (W.O.)
12 Stucco Wing Wall
13 Concrete Paver Caps at Shelf To Slope (W.O.)
14 Accent Ceramic Tile Surround
15 Metal Railing (W.O.)
16 Bay Window
17 Decorative Stucco/Metal Scupper at Decks (W.O.)
18 Stucco Furring
19 Metal Awning
20 Decorative Exterior Lights & Raised Number Address
21 Sectional Metal Garage Door
22 Metal Utility Door



Right Elevation



Rear Elevation



Left Elevation



Front Elevation

Source: KTGY Architecture + Planning, July 2025

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Building Elevations – C-400

Exhibit 2-5d

MATERIALS LEGEND

1 Stucco	11 Fiber Cement Board Trim at Bay Window (W.O.)	21 Sectional Metal Garage Door
2 Spanish 'S' Roof Tile	12 Stucco Wing Wall	22 Metal Utility Door
3 Stucco Recess /Reveal at Windows/Doors (2" TYP.)	13 Concrete Paver Caps at Shelf To Slope (W.O.)	
4 Gable End Faux Vent Recess	14 Accent Ceramic Tile Surround	
5 Stucco Finial /Faux Chimney	15 Metal Railing (W.O.)	
6 Decorative Fiberglass Entry Door	16 Bay Window	
7 Vinyl Windows	17 Decorative Stucco/Metal Scupper at Decks (W.O.)	
8 Sloped Stucco Sill	18 Stucco Furring	
9 Stucco Decorative Foam Corbel	19 Metal Awning	
10 Stucco Decorative Foam Eave	20 Decorative Exterior Lights & Raised Number Address	



Right Elevation



Rear Elevation



Left Elevation



Front Elevation

Source: KTGY Architecture + Planning, July 2025

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INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Building Elevations – C-500

Exhibit 2-5e

MATERIALS LEGEND

1 Stucco	11 Fiber Cement Board Trim at Bay Window (W.O.)	21 Sectional Metal Garage Door
2 Spanish 'S' Roof Tile	12 Stucco Wing Wall	22 Metal Utility Door
3 Stucco Recess /Reveal at Windows/Doors (2" TYP.)	13 Concrete Paver Caps at Shelf To Slope (W.O.)	
4 Gable End Faux Vent Recess	14 Accent Ceramic Tile Surround	
5 Stucco Finial /Faux Chimney	15 Metal Railing (W.O.)	
6 Decorative Fiberglass Entry Door	16 Bay Window	
7 Vinyl Windows	17 Decorative Stucco/Metal Scupper at Decks (W.O.)	
8 Sloped Stucco Sill	18 Stucco Furring	
9 Stucco Decorative Foam Corbel	19 Metal Awning	
10 Stucco Decorative Foam Eave	20 Decorative Exterior Lights & Raised Number Address	



Right Elevation



Rear Elevation



Left Elevation



Front Elevation

Source: KTGY Architecture + Planning, July 2025

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FIRST & MOUNTAIN VIEW PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Building Elevations – C-600

Exhibit 2-5f

AMENITIES AND OPEN SPACE

Open space areas are proposed in various locations of the development; refer to Exhibit 2-3. A total of 10,876 square feet (ten percent of the site area) of common open space would be provided. Specifically, an approximately 3,710-square foot central open space/picnic area is proposed with amenities, including a pedestal barbecue and hot coal grill, picnic table, trash and recycling receptacles, a pedestrian bench, and bike racks; as discussed, the project would be all-electric with no natural gas services provided for these site amenities. Additionally, an approximately 635-square foot elevated corner plaza with enhanced paving and raised planter boxes is proposed in the northwest corner of the site adjacent to the proposed live/work units. Furthermore, a 5,266-square foot open space with a meandering walkway with benches would be constructed along the southern project boundary to provide pedestrian access to the southern residential buildings. The main driveway would also be improved with smaller open space pockets on each side.

Approximately 101 square feet of private open space (second-story deck or patio) would also be provided for each townhome unit. Additionally, each unit would include 250 cubic feet of private storage spaces.

LANDSCAPING

Ornamental landscaping would be installed throughout the project site; refer to Exhibit 2-6, *Conceptual Landscape Plan*. Planting materials would consist of a mix of trees, groundcover, shrubs, and ornamental grasses. Trees may include marina strawberry trees, crape myrtle, flax leaf paper bark, Australian willow, and golden rain tree; groundcover may include new gold lantana, myoporum, lavender cotton, blue chalksticks, and low coast rosemary; shrubs may include dwarf bottle brush, rockrose, noel's grevillea, compact Texas ranger, munstead lavender, true myrtle, dwarf heavenly bamboo, dwarf Indian Hawthorne, autumn sage, germander, dwarf shiny xylosma; and ornamental grasses may include tangerine stalked bulbine, and mat rush. Across the entire project site, the total landscaped area would cover approximately 14,835 square feet.

Six-foot high block walls would be constructed along the site's southern and eastern boundaries, and low crib walls with handrails would be constructed along the site's northern boundary fronting West First Street.

UTILITIES AND SERVICES

The following utilities and services would serve the project site:

- *Water*. The project site would be served by the City of Santa Ana. Proposed eight-inch private domestic water lines and eight-inch fire water lines would be constructed on-site to connect to existing public water facilities in West First Street.

- *Sewer*. The City of Santa Ana would provide sanitary sewer service to the project site. Eight-inch private sewer laterals would be constructed on-site to connect to existing sewer facilities in South Mountain View Street.

- *Drainage*. The proposed project would install catch basins and storm drains in the northern portion of the site that flow towards a proposed pump in the new driveway. Runoff on-site would flow towards on-site catch basins and directed to outflow to existing gutters along South Mountain View Street and West First Street.

- *Dry Utilities*. The project site would be served by Southern California Edison, AT&T, and Time Warner Cable for electricity, telephone, and cable TV services, respectively. Electricity connections would be constructed on-site to connect to existing service lines in South Mountain View Street and/or West First Street. As discussed, the project would be all-electric and no natural gas services would be utilized by the proposed development.



LEGEND

1. PICNIC AREA WITH ACCESSIBLE TABLE, TRASH RECEPTACLE AND BBQ PEDESTAL
2. BIKE RACK
3. BENCH ON CONCRETE PAD
4. TRASH ENCLOSURE
5. LOCKABLE ENTRY / EXIT GATE
6. LOCKABLE GATE - EMERGENCY AND MAINTENANCE ACCESS ONLY
7. ENHANCED PAVING AT CROSSINGS
8. LOW CRIB WALL WITH HANDRAIL
9. PERIMETER BLOCK WALL. SEE WALL PLAN.
10. PIP CONCRETE SEAT WALL
11. COMMUNITY MAILBOX SHELTER

PRELIMINARY PLANT PALETTE

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS
	TREES			
	(ACCENT TREES)			
	Arbutus unedo 'Marina'	Marina Strawberry Tree	24" Box	L
	Lagerstroemia indica	Crape Myrtle	24" Box	M
	Melaleuca linariifolia	Flax Leaf Paper Bark	24" Box	L
	(PARKING LOT SHADE TREE)			
	Geijera parviflora	Australian Willow	24" Box	L
	Koelreuteria paniculata	Golden Rain Tree	24" Box	L
	(STREET TREE)			
	Cercis 'Forest Pansy'	Eastern Redbud	24" Box	L
	Lagerstroemia 'Tuscarora'	Crape Myrtle	24" Box	L
	GROUND COVER			
	Lantana 'New Gold'	New Gold Lantana	5 Gal	L
	Myoporum parvifolium	Myoporum	1 Gal	L
	Santolina chamaecyparissus	Lavender Cotton	1 Gal	L
	Senecio serpens	Blue Chalksticks	1 Gal	L
	Westringia fruticosa ' Mundi'	Low Coast Rosemary	1.5 Gal	L
	SHRUBS			
	Callistemon 'Little John'	Dwarf Bottle Brush	5 Gal	L
	Cistus purpureus	Rockrose	1.5 Gal	L
	Grevillea 'Noelii'	Noel's Grevillea	1.5 Gal	L
	Leucophyllum f. 'Compacta'	Compact Texas Ranger	1.5 Gal	L
	Lavandula 'Munstead'	Munstead Lavender	5 Gal	L
	Myrtus communis	True Myrtle	5 Gal	L
	Nandina 'Fire Power'	Dwarf Heavenly Bamboo	5 Gal	L
	Rhaphiolepis 'Ballerina'	Dwarf Indian Hawthorne	1.5 Gal	L
	Salvia greggii	Autumn Sage	5 Gal	L
	Teucrium chamedrys	Germander	1 Gal	L
	Xylosma c. 'Conpacta'	Dwarf Shiny Xylosma	1.5 Gal	L
	ORNAMENTAL GRASSES			
	Bulbine frutescens 'Tiny Tangerine'	Tangerine Stalked Bulbine	1 Gal	L
	Lomandra longifolia 'Breeze'	Mat Rush	5 Gal	L
	SCREENING HEDGE			
	Podocarpus Macrophyllus	Yew Plum Pine	1.5 Gal at 6' o.c.	L
	Prunus Caroliniana	Carolina Cherry	1.5 Gal at 6' o.c.	L

OPEN SPACE SUMMARY
LANDSCAPE AREA = 14,835 SF

Source: Verde Design, October 2025

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FIRST & MOUNTAIN VIEW PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Conceptual Landscape Plan

Exhibit 2-6

GENERAL PLAN AMENDMENT

The project proposes a General Plan Amendment to change the site's land use designations from GC and LMR-11 to Urban Neighborhood-Low (UN-20). The UN-20 designation would allow a maximum of 20 dwelling units per acre, 1.0 floor area ratio (FAR), and a maximum building height of three stories. Upon approval, the project site's maximum base density would be 50 dwelling unit. The project would support the General Plan by promoting housing near transit and converting commercial/industrial zoning into residential use (with low-income units) that supports the City's long-term housing goals.

ZONE CHANGE

The project proposes a Zone Change to change the site's zoning from C2 and M1 to Specific Development (SD). The SD zone accommodates a specific development plan for a project site in accordance with an approved development plan and specific development standards. The proposed SD zone is designed to complement development within the Harbor Mixed Use Transit Corridor (approximately 0.25-mile to the east of the project site).

TENTATIVE TRACT MAP

A Tentative Tract Map is proposed as part of the project to subdivide the property for the sale of each townhome unit.

DENSITY BONUS

The project is requesting a California Government Code Section 65915 et seq. density bonus. The proposed UN-20 land use designation would allow a maximum base density of 50 units on the 2.54-net acre site. The project includes five percent Very Low Income units (three total units), and therefore, would be entitled to a 20 percent bonus density under the State Density Bonus Law, for a total of 61 units proposed on the 2.54-net acre site. The proposed density bonus complies with the City's Housing Opportunity Ordinance (*Santa Ana Municipal Code* [Municipal Code] Section 41-1902(c)). The three Very Low Income units would be deed restricted.

DENSITY BONUS WAIVER

The project requests a density bonus waiver from the minimum required common open space area. The City requires 15 percent common open space; however, the project provides approximately 9.8 percent (10,876 square feet). This waiver allows the project to be developed with increased density (additional units) that would otherwise be physically infeasible.

2.5 PHASING/CONSTRUCTION

Project construction would occur as a single phase and would require approximately 5,833 cubic yards of soil import. Construction activities are anticipated to occur for approximately 15 months. Anticipated construction equipment for the proposed project was provided by the project Applicant; no vibratory rollers would be utilized.

2.6 AGREEMENTS, PERMITS, AND APPROVALS

The City of Santa Ana, as Lead Agency, has discretionary authority over the proposed project, which requires the following discretionary approvals:

- California Environmental Quality Act Clearance;
- Development Plan Review;
- General Plan Amendment;
- Zone Change;

- Tentative Tract Map;
- Density Bonus; and
- Density Bonus Waiver.

The project also requests increased allowable density pursuant to the State Density Bonus Law and will be processed with a Senate Bill SB 330 application, pursuant to the Housing Crisis Act of 2019, to obtain vesting rights and an expedited approval process.

In addition, the following permits/approvals may be required of other agencies:

- General Construction Permit – Santa Ana Regional Water Quality Control Board (as required under National Pollutant Discharge Elimination System [NPDES] General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ, NPDES No. CAS000002).

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3.0 INITIAL STUDY CHECKLIST

3.1 BACKGROUND

1. Project Title:

First & Mountain View Project

2. Lead Agency Name and Address:

City of Santa Ana
20 Civic Center Plaza
Santa Ana, California 92701

3. Contact Person and Phone Number:

Nancy Tran, AICP, Senior Planner
714.667.2740

4. Project Location:

The 2.54-net acre project site includes parcels located at 4320 West First Street (Assessor's Parcel Numbers [APNs] 188-021-11 and 188-021-12) and 201 South Mountain View Street (APN 188-021-10) within the City of Santa Ana; together, the parcels are referred to as the project site.

5. Project Sponsor's Name and Address:

Storm Properties, Inc.
Storm Bird, Real Estate Development Manager
970 West 190th Street, Suite 995
Torrance, California 90502
310.986.2439

6. General Plan Designation:

General Commercial (GC) and Low-Medium Density Residential (LMR-11)

7. Zoning:

General Commercial (C2) and Light Industrial (M1)

8. Description of the Project:

The project proposes to develop a residential community consisting of 61 for-sale townhome units with approximately 10,876 square feet of common open space and 136 parking spaces. The residential community would consist of nine separate three-story townhouse buildings (four-plex to ten-plex) totaling approximately 103,759 square feet in living area (excluding garages and open spaces). Additional details regarding the project are provided in Section 2.3, *Project Characteristics*.

9. Surrounding Land Uses and Setting:

Surrounding land uses include a mixture of residential and commercial uses. Specifically, land uses surrounding the project site include:

- *North:* West First Street is located immediately north. Further north of West First Street consists of single- and multi-family residential uses and commercial uses (e.g., restaurants, grocery stores, and retail). These areas are designated Medium Density Residential (MR-15) and LMR-11, and zoned C2 and Two Family Residential (R2).
- *East:* An existing multi-family residential community (Parkside Court Apartments) is located to the east. This area is designated LMR-11 and zoned Specific Development No. 32 (SD32).
- *South:* A public use (City of Santa Ana Public Works Department water reservoir) is located to the south. This area is designated LMR-11 and zoned Open Space Land (O); and
- *West:* South Mountain View Street is located immediately west. A vacant lot used by the City of Santa Ana Public Works Department for equipment storage is located further to the west. This area is designated GC and zoned C2 and M1.

10. Other public agencies whose approval is required (e.g., permits, financing approval or participation agreement).

Refer to Section 2.6, *Agreements, Permits, and Approvals*, for a description of the permits and approvals anticipated to be required for the project. Additional approvals may be required as the project entitlement process moves forward.

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

In accordance with Assembly Bill (AB) 52 and Senate Bill (SB) 18, consultation letters for the proposed project were mailed via certified return receipt mail on September 8, 2025. Refer to Section 4.18, *Tribal Cultural Resources*, for a detailed description of the project's tribal consultation process and relevant analysis.

3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This Initial Study/Mitigated Negative Declaration analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated include:

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

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the CEQA Guidelines Appendix G and used by the City of Santa Ana in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

- *No Impact*. The development will not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The development will have the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.

- *Less Than Significant Impact With Mitigation Incorporated*. The development will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.

- *Potentially Significant Impact*. The development will have impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels.

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4.0 ENVIRONMENTAL ANALYSIS

4.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?				✓
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✓
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning 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. The General Plan does not designate any scenic resources within Santa Ana. Further, the project site is relatively flat and is surrounded in all directions by urbanized uses. As such, the project area does not include any scenic vistas and project development would not have a substantial adverse effect on scenic vistas. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The City does not have any officially designated or eligible State scenic highways that traverse within its planning area.[1] Thus, the project would not substantially damage scenic resources within a State scenic highway. No impact would occur in this regard.

However, based on the General Plan EIR, the City identifies scenic corridors that form the image of Santa Ana. The closest identified scenic corridor is the First Street and Fourth Street corridors within downtown Santa Ana, which are located approximately 4.3 miles to the east. Given the distance and intervening structures and topography, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[1] California Department of Transportation, *California State Scenic Highway System Map,* https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed September 3, 2025.

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 in all directions by urbanized uses. As such, the following discussion analyzes the project's potential to conflict with applicable zoning and other regulations governing scenic quality.

A discussion of the project's consistency with the Zoning Code, including those governing scenic quality, is presented in Section 4.11, *Land Use and Planning*, specifically Response 4.11(b). The proposed project requires a Zone Change to change the site's zoning from General Commercial (C2) and Light Industrial (M1) to Specific Development (SD). While the project site is not located within the Harbor Mixed Use Transit Corridor Specific Plan (Specific Plan) area, it is approximately 0.25-mile to the west of the Specific Plan area. Thus, the proposed SD zone is designed to be consistent with the Specific Plan development standards for the Neighborhood Transitional land use district. As analyzed in Table 4.11-2, *Neighborhood Transitional Development Standards Consistency Analysis*, the project would be consistent with applicable Neighborhood Transitional development standards of the Specific Plan.

The proposed project would have six different types of building configurations and would have a contemporary Spanish style with painted stucco, bay windows, metal railings, and stone veneers; refer to Exhibit 2-4 through Exhibit 2-5f. Additionally, the proposed townhomes' exterior would be painted in a variety of neutral/warm tones (white stucco walls, red roof tiles, brown beams, blue and plum colored doors, and Spanish tiles). The project's design, including its architectural features, building materials, and landscaping would be reviewed and approved by the City during the Development Plan Review process. This process would verify that the project's design is compatible with development in the surrounding vicinity and that it is consistent with applicable zoning regulations. As a result, implementation of the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Mitigation Measures: 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. A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

The proposed project is located within an urbanized area of the City. As discussed, the site is currently vacant with minimal nighttime security lighting on-site and along the project perimeter. Existing sources of light and glare in the project vicinity are produced by residential uses to the north, east, and west; public facilities (City of Santa Ana Public Works Department water reservoir) to the south; and vehicular traffic and street lighting along West First Street, South Mountain View Street, and neighboring roadways.

The types of land uses that are typically sensitive to excess light and glare include residential uses, hospitals, senior housing, and other types of uses where excessive light may disrupt sleep. The closest light sensitive receptors to the project site include adjacent residential uses to the north and east of the project site.

Construction

Project construction could involve temporary glare impacts as a result of construction equipment and materials. However, based on the project's limited scope of activities, these sources of glare would not be substantial. The project would be required to comply with the Municipal Code Section 18-314, *Special Provisions*, for allowable construction hours, which are limited to between 7:00 a.m. and 8:00 p.m. on weekdays and Saturdays. Construction is not allowed on Sundays or federal holidays. Thus, as no construction activities would be permitted after 8:00 p.m. on weekdays and Saturdays or on Sundays or Federal holidays, no short-term construction-related increase in nighttime lighting would occur.

Operations

As previously discussed, the project site was most recently developed to support the storage of commercial food trucks and food truck commissary operations. However, these operations ceased in April 2025. The proposed project would redevelop the site to allow for the construction of a residential community consisting of 61 townhome units and associated open space and parking. Project implementation would increase lighting at the project site compared to existing conditions. Interior lighting associated with the project may be visible from surrounding uses. However, these lighting conditions would appear similar in character to those emitted from the existing urban uses in the area, including residential uses to the north and east, and commercial uses to the west of the project site. Impacts would be less than significant in this regard. Additionally, pursuant to Municipal Code Section 41-611.1, *Development Standards; Conditions*, all site lighting is required to be arranged in a manner as to not unreasonably interfere with adjacent residences.

Vehicular headlights entering and exiting the project's entrance along South Mountain View Street would also generate new sources of nighttime lighting in the project area. However, upon entry into the project site, vehicular headlights would be screened from surrounding residential uses by proposed six-foot concrete block walls along the project's eastern and southern boundaries. Low crib walls with handrails would be constructed along the site's northern boundary. As a result, vehicular headlights are not anticipated to result in a significant increase in nighttime lighting conditions in the immediate project vicinity.

The proposed project's exterior building materials would include painted stucco, bay windows, metal railings, and stone veneers, among others. These building materials would not generate substantial daytime glare. Further, the City's Development Plan Review process would involve reviewing the project's proposed building materials to ensure neighboring uses are not exposed to substantial daytime glare. As such, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

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4.2 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

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

No Impact. The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] No farmland exists within the site vicinity. Thus, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[1] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/dlrp/ciff/, accessed September 3, 2025.

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

No Impact. The project site is zoned General Commercial (C2) and Light Industrial (M1). The C2 zone allows for a wide range of businesses but does not allow for agricultural use. Similarly, the M1 zone allows for light industrial uses such as manufacturing, assembly, and material processing but does not permit agricultural use.

According to the California Department of Conservation, the Williamson Act contract is an agricultural land protection program that preserves existing agricultural and open space land by discouraging their conversion into urbanized land.[2] Based on the California Department of Conservation, Orange County is a Non-Reporting Participant in the Williamson Act contract.[3] As such, agricultural and open space land under the Williamson Act within Orange County are not reported. It should be noted that based on historical aerials, the site was previously utilized for agricultural purposes from 1953. However, the site was then developed with a union hall in 1965, which was subsequentially demolished in 1996 to allow for the development of commercial food truck storage and parking and commissary operations. Due to the urbanized and built-out nature of the project site, the site would no longer be capable of supporting agricultural use and would not be covered under an existing Williamson Act contract. Thus, project implementation would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur in this regard.

Mitigation Measures: 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 zoned C2 and M1 and is not occupied or used for forest land or timberland. Further, project implementation would not result in the rezoning of forest land, timberland, or timberland zoned timberland production. No impact would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Refer to Response 4.2(c). No impact would occur.

Mitigation Measures: 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. Refer to Responses 4.2(a) through 4.2(d). No impact would occur.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Conservation, *Williamson Act FAQ 2024*, https://www.conservation.ca.gov/dlrp/wa/Documents/Williamson%20Act%20FAQ%202024.pdf, accessed September 3, 2025.

[3] Department of Conservation, *Williamson Act Enrollment Finder*, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/, accessed September 3, 2025.

4.3 AIR QUALITY

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

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

Less Than Significant Impact. On December 2, 2022, the South Coast Air Quality Management District (SCAQMD) Governing Board adopted the 2022 Air Quality Management Plan (AQMP). The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, updated emission inventory methodologies for various source categories. Additionally, the 2022 AQMP utilized information and data from Southern California Association of Governments (SCAG) and its *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). In April 2024, SCAG adopted Connect SoCal 2024, an update to the 2020-2045 RTP/SCS. However, SCAQMD has not released an updated AQMP. As such, this consistency analysis is based on the 2022 AQMP and the RTP/SCS that was adopted at the time, the 2020-2045 RTP/SCS. According to the SCAQMD's *CEQA Air Quality Handbook*, projects must be analysed for consistency with two main criteria, as discussed below.

Criterion 1:

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

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

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations associated with the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) is used as the basis for evaluating project consistency. As discussed under Responses 4.3(b) and 4.3(c), the project's short-term construction emissions, long-term operational emissions, and localized concentrations of carbon monoxide (CO), nitrogen oxides (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) would be less than significant. Due to the role volatile organic compounds (VOC) plays in ozone (O_3) formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. As such, the project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMP.

b) *Would the project cause or contribute to new air quality violations?*

As discussed in Response 4.3(b) and 4.3(c), construction and operation of the proposed project would result in emissions that would be below the SCAQMD construction and operational thresholds. Therefore, the proposed project would not have the potential to cause or contribute to a violation of the ambient air quality standards.

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

As discussed in Response 4.3(c), the proposed project would result in less than significant impacts regarding localized concentrations during project construction and operations. As such, the proposed project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether the project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Determining whether a project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of the following criteria.

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

A project is consistent with the 2022 AQMP if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2022 AQMP. In the case of the 2022 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the *City of Santa Ana General Plan* (General Plan), SCAG's regional growth forecast, and the SCAG 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The project site is zoned General Commercial (C2) and Light Industrial (M1), and designated General Commercial (GC) and Low-Medium Density Residential (LMR-11). The GC designation provides for highly visible and accessible shopping opportunities along arterial corridors and supports the development and continued operation of recreational, cultural, entertainment, employment, and educational opportunities near established residential neighborhoods. The LMR-11 designation applies to residential areas suitable for multiple building types, including single-family detached homes, small-lot subdivisions, townhomes, duplexes, and mobile home parks. It has a maximum density of 11 dwellings per acre and a typical maximum height of three stories.

The project proposes a General Plan Amendment to change the site's current land use designations from GC and LMR-11 to Urban Neighborhood-Low (UN-20). The UN-20 land use designation would allow for a maximum of 20 dwelling units per acre, 1.0 floor area ratio (FAR), and a maximum building height of three stories. Upon approval of the General Plan Amendment, the 2.54 net acre site would have a maximum base density of approximately 50 dwelling units (20 dwelling units * 2.54 acres). Additionally, the proposed project would also request a California Government Code Section 65915 et seq. density bonus. The proposed project would include five percent Very Low Income units (three units) and would be entitled to a 20 percent bonus density under the State Density Bonus Law, for a total of 61 units. As such, upon approval with the General Plan Amendment and density bonus request, the proposed project would be a permitted use and would comply with the new land use designation of the site.

As discussed in Section 4.14, *Population and Housing*, based on the City's average household size of 3.82, the proposed 61-unit townhome development would introduce up to 233 additional residents within the City. For this reason, the project is considered growth-inducing since it would generate permanent population growth. Conservatively assuming that all 233 new residents relocate from outside of the City, potential population growth associated with the project would represent 0.07 percent increase over the City's existing population of 315,325 persons as of 2025.[1]

Growth forecasts generated by SCAG for the regional plan, Connect SoCal, predict a steady increase in City population through 2045. According to the General Plan, from 2020 to 2030, SCAG estimates that Santa Ana's population will grow by approximately 2,000 residents annually.[2] Nearly 7,000 new units are anticipated to be developed in Santa Ana, which based on an average household size of three to four persons, may result in a population increase of 21,000 to 28,000 new residents by 2030.[3] The project's residential population (233 persons) represents 11.65 percent of the City's annual growth of 2,000 persons, and approximately 0.83 to 1.1 percent of the City's projected population growth by 2030. As noted above, this estimate is considered conservative since it assumes that all project residents would relocate from outside of the City.

Therefore, the project is consistent with the types, intensity, and patterns of land use envisioned for the site vicinity and would be considered consistent with the General Plan. Further, the population, employment, and housing, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to Santa Ana. As the SCAQMD has incorporated these same projections into the 2022 AQMP, it can be concluded that the proposed project would be consistent with the projections.

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

The proposed project would not require mitigation and would result in less than significant air quality impacts; refer to Responses 4.3(b) and 4.3(c). In addition, the project would comply with all applicable SCAQMD rules and regulations, including Rule 403 that requires control of excessive fugitive dust emissions by regular watering or other dust prevention measures, and Rule 1113 that regulates the ROG content of paint. As such, the proposed project meets this AQMP consistency criterion.

c) *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

Land use planning strategies set forth in the 2022 AQMP are primarily based on the 2020-2045 RTP/SCS. The eastbound First Street/Newhope Street bus stop serviced by the Orange County Transportation Authority (OCTA) Route 64 bus is located approximately 93 feet west of the project site. Additionally, other bus stops along First Street are located within one mile of the project site. The proposed project would also provide bicycle parking spaces on-site which would encourage the use of cycling as an alternative mode of transportation and reduce solo driving trips. Furthermore, as detailed in Section 4.17, *Transportation*, the project would result in less than significant vehicle miles traveled (VMT) impacts. Therefore, the project would be consistent with the actions and strategies of the 2020-2045 RTP/SCS to reduce VMT and related mobile source emissions.

In conclusion, the determination of 2022 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed project would not result in a long-term impact on the region's ability to meet State and federal air quality. Also, the proposed project would be consistent with the goals and policies of the 2022 AQMP for control of fugitive dust. As discussed above, the proposed project's long-term influence would also be

1 City of Santa Ana, *City of Santa Ana General Plan Housing Element 2021-2029, Table A-1, Population Growth Trends*, September 16, 2022.
2 Ibid.
3 Ibid.

consistent with the SCAQMD and SCAG's goals and policies and is, therefore, considered consistent with the 2022 AQMP.

Mitigation Measures: 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.

Criteria Pollutants

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of CO.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratosphere (the "good" O_3 layer) extends upward from about 10 to 30 miles and protects life on earth from the sun's harmful ultraviolet rays. "Bad" O_3 is a photochemical pollutant, and needs volatile organic compounds (VOCs), nitrogen oxides (NO_X), and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O_3 in the upper atmosphere (stratosphere) protects the earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. O_3 is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of O_3. Short-term exposure (lasting for a few hours) to O_3 at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide (NO_2). NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_X) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates

penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25). Exposure to PM_{10} would result in particles being deposited on the lung surface, causing tissue damage, lung inflammation, and impacting respiratory and cardiovascular health.

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both State and federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In February 2024, the EPA lowered the federal primary $PM_{2.5}$ annual standard to 9.0 microgram per cubic meter (ug/m^3) from the 12.0 ug/m^3 standard set in 2012. The secondary annual standard remains at 15.0 ug/m^3. States and Tribal Authorities will submit initial recommendations of areas that do not attain this standard (i.e., nonattainment areas) to EPA by February 2025, and EPA will finalize area designations by February 2026.

On June 20, 2002, CARB adopted amendments for statewide annual ambient particulate matter air quality standards. These standards were revised/established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current State standards during some parts of the year, and the statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

Due to the size of $PM_{2.5}$, these particles are more likely to be inhaled and deposited in the deeper parts of the lungs. Short-term exposure (up to 24 hours) would result in chronic bronchitis, asthma attacks, respiratory symptoms, and premature mortality.

Sulfur Dioxide (SO_2). Sulfur dioxide (SO_2) is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with SO_X. Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms VOC and ROG (see below) are used interchangeably. Exposure to VOC vapors would result in eyes, nose, and throat irritation, nausea, headaches, and damage to the liver, kidney, and central nervous system.

Reactive Organic Gases (ROG). Similar to VOCs, ROGs are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and nitrogen oxides react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms ROG and VOC are used interchangeably. Exposure to ROGs would result in the same adverse health effects as VOCs.

Short-Term Construction Emissions

Project construction would primarily generate temporary criteria pollutants from construction equipment operation on-site, construction worker vehicle trips to and from the project site, and from construction material deliveries to and from the project site. Construction input data for California Emissions Estimator Model version 2022.1 (CalEEMod) include, but are not limited to (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; and (3) areas to be excavated and graded. Construction emissions were quantified by estimating the types

and quantity of equipment that would be used on-site during each construction phase, as provided by the model defaults. CalEEMod also estimates off-site emissions from worker, vendor, and hauling truck trips.

The project involves construction activities associated with demolition, grading, building construction, paving, and architectural coating applications. The project would be constructed over approximately 15 months and require approximately 5,833 cubic yards of soil import. The project would demolish approximately 10,990 square feet of existing on-site building area, 99,608 square feet of on-site paved area, and approximately 9,006 square feet of paved area associated with the off-site cul-de-sac improvements. As a result, the project would export approximately 1,481 tons of debris during the demolition phase.[4] For purposes of the air quality analysis, a one-way haul distance of 4.5 miles was assumed based on information provided by the project Applicant.[5] Table 4.3-1, *Project-Generated Unmitigated Construction Emissions*, presents the anticipated daily short-term construction emissions. Refer to Appendix A, *Air Quality/GHG/Energy Analysis*, for detailed CalEEMod outputs and results.

Table 4.3-1
Project-Generated Unmitigated Construction Emissions

Emissions Source	Pollutant (pounds/day)[1,2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1 Construction Emissions (2026)	2.80	24.07	29.04	0.05	3.70	1.99
Year 2 Construction Emissions (2027)	12.10	16.67	24.48	0.04	1.51	0.75
Maximum Daily Emissions	**12.10**	**24.07**	**29.04**	**0.05**	**3.70**	**1.99**
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions were calculated using CalEEMod version 2022.1. Higher emissions between winter and summer are presented as a conservative analysis.
2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.

Source: Refer to Appendix A for assumptions used in this analysis.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways. Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading and construction is expected to be short-term and would cease upon project completion. It should be noted that most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

[4] Demolition debris quantities were estimated based on project-specific assumptions developed to support CalEEMod construction inputs. Asphalt concrete (AC) pavement demolition quantities were calculated using paved surface area and an assumed material density of 145 pounds per cubic foot. Building demolition was represented as concrete using an assumed equivalent thickness and standard material density. Based on these assumptions, demolition of approximately 9,006 square feet of AC pavement (approximately 54.4 tons), 99,608 square feet of AC pavement (approximately 601.8 tons), and 10,990 square feet of building area (approximately 824.3 tons) would result in a total demolition quantity of approximately 1,480.5 tons. This total demolition quantity was used as input to the CalEEMod construction demolition module.

[5] Demolition materials would be hauled to the Madison Public Disposal Facility, located approximately 4.5 miles from the project site at 1035 East 6th Street, Santa Ana, California 92701.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and sulfur oxides (SO_X) combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

Construction activities would comply with SCAQMD Rule 402, which prohibits fugitive dust from creating a nuisance off-site, and Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SCAQMD Rule 403 would greatly reduce PM_{10} and $PM_{2.5}$ concentrations. It should be noted that these estimated reductions were applied in CalEEMod. As depicted in Table 4.3-1, total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Thus, construction-related air quality impacts related to fugitive dust emissions would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions (e.g., NO_x and CO) from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site. As depicted in Table 4.3-1, construction equipment and worker vehicle exhaust emissions would be below the established SCAQMD thresholds. Therefore, air quality impacts from equipment and vehicle exhaust emissions would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coating creates ROG emissions, which are O_3 precursors. As required, all architectural coatings for the proposed project structures would comply with SCAQMD Rule 1113. Rule 1113 provides specifications on painting practices as well as regulates the ROG content of paint. ROG emissions associated with the proposed project would be less than significant; refer to Table 4.3-1.

Total Daily Construction Emissions

In accordance with the SCAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As indicated in Table 4.3-1, criteria pollutant emissions during construction of the proposed project would not exceed the SCAQMD significance thresholds. Thus, total construction related air emissions would be less than significant.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are human health hazards when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986. Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and increase the risk of asbestos-related diseases and cancer (i.e., scarring of lungs [asbestosis], pleural disease, lung cancer, and mesothelioma). These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural

weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the California Department of Conservation Division of Mines and Geology, serpentinite and ultramafic rocks are not known to occur within the project area.[6] As such, the project is not subject to naturally occurring asbestos and impacts would be less than significant.

Due to the age of the existing on-site building (constructed prior to 1978), there is the potential for asbestos-containing materials (ACMs). According to SCAQMD Rule 1403 requirements, prior to the start of demolition activities, the existing structure must be surveyed for the presence of ACMs by a specialist that is certified by California Occupational Safety and Health Administration for ACM surveys. If ACMs are determined to be present, Rule 1403 requires that the SCAQMD be notified a minimum of 10 days before demolition activities begin with specific details of all asbestos to be removed, start and completion dates of demolition, work practices and engineering controls to be used to contain the asbestos emissions, estimates on the amount of asbestos to be removed, the name of the waste disposal site where the asbestos will be taken, and the names and addresses of all contractors and transporters that will be involved in the asbestos removal process. Therefore, through adherence to the ACMs removal requirements, detailed in SCAQMD Rule 1403, a less than significant impact pertaining to potential ACMs would result during demolition activities.

Long-Term Operational Emissions

Long-term air quality impacts typically consist of mobile source emissions generated from project-related traffic (i.e., motor vehicle use by employees, deliveries travelling to and from the site), and emissions from area and energy sources. Emissions associated with each of these sources were calculated and are discussed below. It should be noted that the proposed project would replace the existing building. As previously discussed, the food truck storage and commissary is no longer operating and as such, the following analysis only analyzes the proposed project's emissions. Operational emissions generated by the project are detailed in Table 4.3-2, *Project-Generated Operational Emissions*.

Table 4.3-2
Project-Generated Operational Emissions

Emissions Source	Pollutant (pounds/day)[1]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Mobile Source	1.10	0.70	8.05	0.02	1.97	0.51
Area Source	2.71	0.03	3.46	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Total Summer Emissions[2]	**3.81**	**0.73**	**11.51**	**0.02**	**1.97**	**0.51**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Project Winter Emissions						
Mobile Source	1.09	0.76	7.59	0.02	1.97	0.51
Area Source	2.40	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Total Winter Emissions[3]	**3.49**	**0.76**	**7.59**	**0.02**	**1.97**	**0.51**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

6 California Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf, accessed September 22, 2025.

Notes: 1. Emissions were calculated using CalEEMod version 2022.1, as recommended by the SCAQMD. 2. The numbers may be slightly off due to rounding.
Source: Refer to Appendix A for assumptions used in this analysis.

Mobile Source Emissions

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions were estimated using CalEEMod. According to the *Focused Traffic Study for First & Mountain View Residential Project,* prepared by Linscott, Law & Greenspan, Engineers (dated September 23, 2025), the proposed project would generate approximately 379 average daily trips; refer to Appendix G, *Transportation Studies*. As shown in Table 4.3-2, mobile source emissions for both summer and winter would not exceed established SCAQMD thresholds. Therefore, impacts in this regard would be less than significant.

Energy Source Emissions

The project would be an all-electric development and would not consume natural gas. The primary use of electricity for the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. It should be noted that electricity would be produced off-site at regional power generation facilities and therefore would not generate on-site criteria pollutants. Project electricity consumption would only generate off-site greenhouse gas emissions. Energy source emissions would not exceed established SCAQMD thresholds; refer to Table 4.3-2. Impacts in this regard would be less than significant.

Area Source Emissions

Project area source emissions would be generated from consumer products, architectural coating applications, and landscaping. As shown in Table 4.3-2, area source emissions during both summer and winter would not exceed established SCAQMD thresholds. Impacts would be less than significant in this regard.

Total Operational Emissions

As shown in Table 4.3-2, the total operational emissions would not exceed the SCAQMD significance thresholds. Therefore, impacts in this regard would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors, VOCs and NO_X, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD (April 6, 2015) for the *Sierra Club vs. County of Fresno*, the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants

for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form.[7] Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (April 13, 2015) for the *Sierra Club vs. County of Fresno*, SJVAPCD acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.[8]

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. The SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at highest monitored sites by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3 -related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. As the project would not exceed SCAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

Mitigation Measures: No mitigation measures are required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as those most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

Sensitive receptors near the project site include adjacent residential uses directly to the north and east, with the closest sensitive receptors being the multi-family residences (Parkside Court Apartments) located directly adjacent to the east of the project site. To identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LSTs) for construction and operations impacts. The CO hotspot analysis following the LST analysis

LOCALIZED SIGNIFICANCE THRESHOLDS

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, $PM_{2.5}$, and/or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over five acres should perform air quality dispersion

[7] South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno,* April 3, 2015.

[8] San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, April 13, 2015.

modeling to assess impacts to nearby sensitive receptors. The project site is located within Source Receptor Area (SRA) 17, *Central Orange County*.

Construction LST

The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day.[9] SCAQMD provides LST thresholds for one-, two-, and five-acre site disturbance areas; SCAQMD does not provide LST thresholds for projects over five acres. The project would actively disturb less than one acre per day during the grading phase of construction. Therefore, the LST thresholds for one-acre were utilized for the construction LST analysis. The closest sensitive receptors are the existing multi-family residential units adjacent to the project site to the east. These sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive uses are located less than 25 meters away from the project site, the LST values for 25 meters were utilized for the following evaluation.

Table 4.3-3, *Localized Emissions Significance*, shows the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 17. It is noted that the localized emissions presented in Table 4.3-3 are less than those in Table 4.3-1 because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As shown in Table 4.3-3, localized construction emissions would not exceed the LSTs for SRA 17. Therefore, localized significance impacts from construction would be less than significant.

Table 4.3-3
Localized Emissions Significance

Source[1,2,3]	Pollutant (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Year 1 (2026)	22.96	25.79	2.78	1.75
Year 2 (2027)	16.27	21.03	0.57	0.53
Maximum Daily Emissions	**22.96**	**25.79**	**2.78**	**1.75**
Localized Significance Threshold[4]	*81*	*485*	*4*	*3*
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes:
1. The demolition phase emissions in Year 1 are presented as the worst-case scenario for NO_X and CO, and the grading phase emissions, also in Year 1, present the worst-case scenario for PM_{10}, and $PM_{2.5}$.
2. The building construction phase emissions in Year 2 are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$.
3. The reduction/credits for construction emissions are based on "compliance with established SCAQMD requirements (Rule 402 and 403). Compliance with SCAQMD Rules are reflected in CalEEMod to include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.
4. The Localized Significance Threshold was determined using Appendix C of the SCAQMD's *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately one acre; therefore, the one-acre threshold was used) for Source Receptor Area 17, Central Orange County.

Source: Refer to Appendix A for assumptions used in this analysis.

9 The number of acres represent the total acres traversed by grading equipment. To properly grade a piece of land, multiple passes with equipment may be required. The disturbance acreage is based on the equipment list and days of the grading phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday.

Operational LST

According to SCAQMD LST methodology, LSTs would apply to operational activities if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The proposed project does not include such uses. Thus, due to the lack of such emissions, no long-term LST analysis is needed. Operational LST impacts would be less than significant in this regard.

CARBON MONOXIDE HOTSPOTS

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (e.g., adversely affecting residents, school children, hospital patients, and the elderly).

The Basin is designated as an attainment/maintenance area for the federal CO standards and an attainment area under State standards. There has been a decline in CO emissions even though VMT on U.S. urban and rural roads have increased; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions. Three major control programs have contributed to the reduced per-vehicle CO emissions, including exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD *CEQA Air Quality Handbook*, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 parts per million (ppm), which is the 8-hour California ambient air quality standard. As previously discussed, the site is in SRA 17. Communities within SRAs are expected to have similar climatology and ambient air pollutant concentrations. The monitoring station closest to the project site is the Anaheim-812 West Vermont Street Monitoring Station, which is located approximately five miles north of the project site. The CO measurements collected by this monitoring station are representative of the background CO concentration due to its proximity to the project. Based on data ranging from January 2025 to September 2025, the maximum CO concentration at West Los Angeles-VA Hospital Monitoring station was measured at 1.818 ppm.[10] Given that the background CO concentration does not currently exceed 9.0 ppm, a CO hotspot would not occur at the project site.

Additionally, a detailed CO analysis was conducted in *the Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*, which is the most recent AQMP that addresses CO concentrations. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the proposed project since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 ppm), which is well below the 35-ppm 1-hr CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily trip (ADT) volume of approximately 100,000 vehicles per day. First Street between Newhope Street and Harbor Boulevard currently has traffic volumes of approximately 29,261 ADT.[11] Additionally, Newhope Street between McFadden Avenue and First Street, as well as First Street and Fifth Street have traffic volumes of 26,264 and 28,079 ADT, respectively. Even with the addition of the project's traffic generation of 379 daily trips (refer to Appendix G), First Street and Newhope Street would not experience traffic volumes exceeding 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections near the project site due to the comparatively low volume of project-

[10] California Air Resources Board, *Anaheim-812 W Vermont Street, Daily 1 Hr Avg Carbon Monoxide Data, 2025*, https://www.arb.ca.gov/aqmis2/display.php?param=CO&units=007&year=2025&report=SITE1YR&statistic=DMAX1HR&site=3809&ptype=aqd&std15=, accessed September 22, 2025.

[11] City of Santa Ana, *Traffic Census 2023-2024*, https://storage.googleapis.com/proudcity/santaanaca/2022/03/Traffic-Census-Report-2023_2024.pdf, accessed September 22, 2025.

related trips. Therefore, CO hotspot impacts would not be experienced in the project's vicinity and a less than significant impact would occur in this regard.

AIR QUALITY HEALTH IMPACTS

Construction

Construction of the proposed project would involve the use of diesel-powered equipment, which would emit diesel particulate matter (DPM), a toxic air contaminant as identified by the CARB. DPM emissions are commonly associated with diesel-fueled off-road construction equipment and can result in localized exposure, particularly where construction activities occur near sensitive receptors.

Construction activities would be temporary and intermittent and would vary spatially across the approximately 2.54-acre project site over the construction period. While sensitive receptors are located in the vicinity of the project site, construction-related DPM emissions would occur over a limited duration and would not represent a long-term, continuous source of toxic air contaminants. In addition, construction equipment would be required to comply with California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which limit idling of diesel engines to no more than five minutes. Compliance with these regulations would reduce unnecessary diesel emissions during construction.

To further reduce construction-related DPM emissions and potential exposure at nearby sensitive receptors, the project would implement Mitigation Measure AQ-1, which requires that all off-road diesel construction equipment greater than 50 horsepower be equipped with U.S. EPA-certified Tier 4 Final engines. Tier 4 Final engines achieve substantial reductions in particulate matter emissions compared to older engine tiers and represent the most stringent diesel emission standards currently applicable to off-road construction equipment.

With implementation of Mitigation Measure AQ-1, construction-related diesel particulate matter emissions would be substantially reduced. Accordingly, potential health impacts associated with exposure to toxic air contaminants during construction would be less than significant, and construction activities associated with the proposed project would not result in elevated health risks to nearby sensitive receptors.

Operations

The proposed project would not generate substantial DPM emissions because residential developments do not involve significant heavy-duty truck activity or diesel-powered equipment operations. DPM is primarily associated with high-intensity diesel uses such as distribution centers and truck stops. Consistent with SCAQMD guidance, DPM health risk assessments are recommended for projects which generate more than 100 heavy-duty truck trips per day. As the project proposes a residential use and would not generate more than 100 heavy-duty truck trips per day, operation of the proposed project is not anticipated to result in elevated health risks to nearby sensitive receptors. As such, project operational health impacts would be less than significant.

Mitigation Measures:

AQ-1 The construction contractor shall ensure that off-road diesel construction equipment of 50 horsepower (HP) or greater shall comply with EPA/CARB Tier 4 emissions standards or equivalent and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the contractor for documentation of compliance and for future review by the South Coast Air Quality Management District, as necessary. The Certification Statement must state that the contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract.

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

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses identified by the SCAQMD as being associated with odors. As such, operation of the proposed project would not generate odors that would impact nearby receptors and a less than significant impact would occur in this regard.

Furthermore, certain odors may emanate from diesel-powered construction equipment during the construction period for the project. These odors would be limited to the construction period and would disperse quickly; therefore, these odors would not be considered a significant impact. In addition, the project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The project would also comply with the SCAQMD Rule 1113, which would minimize odor impacts from ROG emissions during architectural coating. Any impacts to existing adjacent land uses would be short-term and are less than significant.

Mitigation Measures: No mitigation measures are required.

4.4 BIOLOGICAL RESOURCES

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

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 currently developed with a vacant industrial/commercial building on the southern portion of the site. The remainder of the site is predominantly paved as an asphalt parking lot except for ornamental street landscaping along the perimeter of the site bordering West First Street and South Mountain View Street. The site does not support any sensitive or special status species and project implementation would not adversely affect any candidate, sensitive, or special status species. Thus, no impact would occur in this regard.

Mitigation Measures: 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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. As stated, the project site is entirely disturbed and predominantly paved. No riparian habitat or sensitive natural communities occur on-site. Additionally, the site is surrounded by residential, industrial, and commercial uses in an urbanized environment. Thus, project implementation would not adversely affect riparian habitat or other sensitive natural communities. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are 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. As discussed, the project site is entirely disturbed and is paved and developed and located within an urbanized area of the City. According to the U.S. Fish and Wildlife Services' *National Wetlands Inventory Mapper*, there are no wetlands on-site, and the closest wetlands to the project site are associated with the Santa Ana River, approximately one mile to the east.[1] Thus, project implementation would not adversely affect any State or federally protected wetlands. No impact would occur in this regard.

Mitigation Measures: 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 With Mitigation Incorporated. The project site is disturbed and located within an urbanized area of the City. Based on the lack of suitable habitat within the project site and surrounding vicinity, there are no areas within the project vicinity which could function as wildlife corridors or nursery sites. However, as shown on Exhibit 2-6, the proposed project would result in the removal (and replanting) of ornamental street trees, including mature trees along West First Street and South Mountain View Street. Thus, the project could result in potential impacts to nesting birds protected by the Migratory Bird Treaty Act (MBTA). The MBTA prohibits activities that result in the direct take (defined as killing or possession) of a migratory bird. The proposed project has the potential to impact nesting birds if construction activities occur during the nesting season. As such, Mitigation Measure BIO-1 would require a pre-construction clearance survey for nesting birds be conducted if ground disturbing activities or removal of trees, shrubs, or any potential nesting habitat occur between February 1 through August 31. Thus, implementation of Mitigation Measure BIO-1 would ensure ground disturbing activities do not adversely impact nesting birds on-site. With implementation of Mitigation Measure BIO-1, impacts would be reduced to less than significant levels.

Mitigation Measures:

BIO-1 If ground-disturbing activities or removal of any trees, shrubs, or any other potential nesting habitat are scheduled within the avian nesting season (generally from February 1 through August 31), a pre-construction clearance survey for nesting birds shall be conducted within three days prior to any ground disturbing activities.

The biologist conducting the clearance survey shall document the negative results if no active bird nests are observed on the project site during the clearance survey with a brief letter report indicating that no impact to active bird nests would occur before construction can proceed. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a 300-foot buffer around the active nest. For raptor species, this buffer shall be 500 feet. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Results of the pre-construction survey and any subsequent monitoring shall be provided to the California Department of Fish and Wildlife (CDFW) and other appropriate agencies.

[1] U.S. Fish and Wildlife Services, *National Wetlands Inventory Mapper*, https://www.fws.gov/wetlands/Data/Mapper.html, accessed July 23, 2025.

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

Less than Significant Impact. Municipal Code Chapter 33, Article VII, *Regulation of the Planting, Maintenance, and Removal of Trees*, establishes policies and standards for the planting, maintenance, and removal of street trees in Santa Ana. Removal of existing trees along West First Street and South Mountain View Street would comply with the City's existing regulations and local policies governing biological resources. As such, the project would not conflict with any local policies or ordinances protecting biological resources and impacts would be less than significant.

Mitigation Measures: 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. According to the California Department of Fish and Wildlife, the proposed project is located within the plan area of the Orange County Transportation Authority (OCTA) Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP).[2] The OCTA NCCP/HCP encompasses all of Orange County and involves the acquisition, conservation, and enhancement of natural habitat as mitigation for impacts on biological resources from freeway capital improvement projects.[3] No natural habitat is present on-site and thus, the site would not be a candidate for conservation or enhancement under the OCTA NCCP/HCP. Additionally, the project is not a freeway capital improvement project. As such, development of the project would not conflict with the OCTA NCCP/HCP and no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

[2] California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, April 2019, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed July 23, 2025.

[3] Orange County Transportation Authority, *Implementing Agreement for the Orange County Transportation Authority Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP)*, 2016.

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4.5 CULTURAL RESOURCES

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

This section is primarily based upon the *Cultural and Paleontological Resources Assessment for the First & Mountain View Project, Santa Ana, Orange County, California* (Cultural Resources Assessment), prepared by Michael Baker International, dated February 26, 2026; refer to Appendix B, *Cultural Resources Assessment*.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?

No Impact. The Cultural Resources Assessment included a field survey and a record search of the California Historical Resources Inventory System (CHRIS) at the South Central Coast Information Center (SCCIC). The CHRIS record search was conducted to identify previously recorded cultural resources and previously conducted cultural resources studies within a 0.5-mile radius of the project site. Sources of the record search include the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), Office of Historic Preservation (OHP) Properties Directory, OHP Archaeological Determinations of Eligibility File, and California Inventory of Historic Resources. A search of the Sacred Lands File (SLF) was also requested through the Native American Heritage Commission (NAHC). Additionally, the record search included a review of available aerial images of the project site.

Record Search Results

The record search identified 19 historic built environment resources within a 0.5-mile radius of the project site, all of which were determined to be ineligible for listing in the National Register of Historic Places and are not located within or adjacent to the project area. The record search also identified nine previously conducted cultural resources studies within a 0.5-mile radius. One of these previously conducted cultural resource study overlaps the project site.

Historical Evaluation of Subject Property

Associated with the most recent use of the site as a food truck storage yard and commissary, the project site includes a two-story building on the southern portion of the site that was constructed in 1977 and various ancillary structures (i.e., shed for washing trucks, two detached ice storage and distribution structures, guard shack, storage sheds, and utilities). Since the existing two-story building is greater than 50 years old, the Cultural Resources Assessment conducted a historical evaluation of the structure to determine if it is eligible for listing in the California Register of Historical Resources (CRHR).

California Register of Historical Resources Evaluation

To be eligible for listing in the CRHR, a property must be at least 50 years of age and possess significance at the local, State, or national level, under one or more of the following criteria. Based on the analysis below, the subject property is not eligible for listing in the CRHR.

- **Criterion 1.** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

  The project site was developed as a food truck commissary in 1977 and was associated with the rising popularity of food trucks. However, literature review and research indicate that the property is not historically significant since it was one of many facilities that was built to meet the logistical needs for food truck operations. The site was not representative of a momentous occasion in the food truck industry but was rather a reaction to the developing nature of commercial development and consumer habits. Therefore, the site was not known to have made a significant contribution to broad patterns of local, regional, State, or national culture and history. As such, the subject property does not meet the threshold for historical significance under CRHR Criterion 1.

- **Criterion 2.** It is associated with the lives of persons important in our past.

  The Cultural Resources Assessment states that the project site was built and operated by Charlie Akoboff. Research did not produce information indicating that Akoboff was a historically significant individual in the spirit of this criterion. Aside from owning and operating a successful food truck commissary, Akoboff does not appear to have made significant contributions to history. Rather, he appears to have been one of many entrepreneurs that built their business around the rise of food trucks in the late 20th and early 21st centuries. Therefore, the subject property does not meet the threshold for historical significance under CRHR Criterion 2.

- **Criterion 3.** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value.

  The commercial buildings on the project site are common examples of construction utilizing concrete blocks. Additionally, the project site was developed as a food truck commissary; there are six other food truck commissaries in the City and all exhibit the same essential characteristic. The architect for the project site, D.L. Hayes and Associates of Santa Fe Springs is also not a "master". Therefore, the project site does not possess high artistic value or distinctive character-defining features. Specifically, none of the buildings embody the distinctive characteristics of a type, period, or method of construction, nor are they known to be the work of a master architect or craftsman. Therefore, the subject property does not meet the threshold for historical significance under CRHR Criteria 3.

- **Criterion 4.** It has yielded, or may yield, information important in history or prehistory.

  The project site is not and never was the principal source of important information pertaining to significant events, people, architectural style, or building technology. Since the property has been extensively graded and developed, its potential to contain subsurface archaeological resources is nominal. The subject properties do not meet the threshold for historical significance under CRHR Criteria 4.

<u>City of Santa Ana Register of Historic Properties Evaluation Criteria</u>

The City also administers a program for designating properties and districts at the local level. To be eligible for listing in the Santa Ana Register of Historic Properties, a building, structure, object, or site must be at least fifty years old and meet one or more of the following criteria. Based on the analysis below, the subject property is not eligible for listing in the City's register of historic properties.

- **Criterion 1.** Buildings, structures, or objects with distinguishing characteristics of an architectural style or period that exemplify a particular architectural style or design feature.

As discussed under the CRHR Criterion 3, the project site does not embody the distinguishing characteristics of an architectural style or period.

- **Criterion 2.** Works of notable architects, builders, or designers whose style influenced architectural development.

  As discussed under the CRHR Criterion 3, the project site was designed by the architectural firm D.L. Hayes and Associated of Santa Fe Springs. There is insufficient evidence indicating that the firm or its personnel are regarded as masters.

- **Criterion 3.** Rare buildings, structures, or objects or original designs.

  The project site was not developed with any rare structure, buildings, or object of original design. The site was developed as a food truck commissary and there are six other operational food truck commissaries within the City.

- **Criterion 4.** Buildings, structures, objects or sites of historical significance which include places: (a) where important events occurred; (b) associated with famous people, original settlers, renowned organizations and businesses; (c) which were originally present when the city was founded; and (d) that served as important centers for political, social, economic, or social activity.

  As discussed under the CRHR Criterion 1, the project site is not associated with historical events, patterns of events, or people. In addition, it was constructed in 1977 and was not present when the City was founded.

- **Criterion 5**. Sites of archaeological importance.

  As discussed under the CRHR Criterion 4, the subject property does not appear to be a site of archaeological importance.

- **Criterion 6.** Buildings or structures that were connected with a business or use which was once common, but is now rare.

  The subject property is not connected with a business or use which was once common but is now rare. As noted above, the property is one of many food truck commissaries in the City which share the same purpose and physical characteristics. Food truck commissaries are not rare on a local or regional level.

In conclusion, the project site does not meet the criteria for listing in the CRHR or the City's local historic resource register. As such, the existing structures on-site are not identified as a historical resource as defined by CEQA Guidelines Section 15064.5(a). No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. According to the Cultural Resources Assessment, no archaeological remains or prehistoric cultural resources were identified within the project site during the records search or pedestrian survey. Soil mapping indicates that the project site contains 68.4 percent Hueneme find sandy loam and 31.6 percent Metz loamy sand which has the potential to conceal buried archaeological deposits. However, the site includes a layer of artificial fill and heavily disturbed soils at least 50 centimeters thick. The Cultural Resources Assessment determined that the site's archaeological sensitivity is low due to its disturbed nature however, the

sensitivity may increase if excavation exceeds the depths of prior disturbances. As noted, the majority of construction activities would occur within existing previously disturbed soils and the maximum depth of excavation would be approximately three feet below grade. As such, the site has low archaeological sensitivity.

Nevertheless, the Cultural Resources Assessment acknowledges that archaeological sensitivity can increase if excavation exceeds the previous depth of prior disturbances. As anticipated earth-moving activities can include excavation activities to install underground utilities, project construction activities have the potential to impact undiscovered archaeological resources. Thus, Mitigation Measure CUL-1 requires that if cultural resources are discovered during ground-disturbing activities, all construction efforts cease until a qualified professional archaeologist who meets the Secretary of the Interior's Standards examines the site, identifies the archaeological significance of the find, and recommends a course of action. With implementation of Mitigation Measures CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant.

Mitigation Measures:

CUL-1 If previously undiscovered cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt and the project applicant shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources. In the event that an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project applicant and City of Santa Ana to implement Native American consultation procedures.

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

Less Than Significant Impact. Due to the level of past disturbance on the project site and in the site vicinity, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, if human remains are found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5 through 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the NAHC, and consultation with the individual identified by the NAHC to be the most likely descendant. If human remains are found during excavation, excavation must stop near the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains are less than significant.

Mitigation Measures: No mitigation measures are required.

4.6 ENERGY

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

REGULATORY FRAMEWORK

State

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. SB 100 requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), state board, and all other state agencies incorporate this policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and state board to utilize programs authorized under existing statutes to achieve such renewable energy goals.

California Building Energy Efficiency Standards (Title 24)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) is commonly referred to as “Energy Code” or “Title 24”. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The lates Title 24 (2025 Title 24) standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. The 2025 Title 24 went into effect January 1, 2026, which means buildings whose permit applications are applied for on or after January 1, 2026 must comply with the 2025 Title 24 standards.

California Green Building Standards (CALGreen)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) is commonly referred to as CALGreen. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green building standards to meet the goals of California’s landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHGs) to 1990 levels by 2020. CALGreen was developed to (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that

sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials. The lates CALGreen (2025 CALGreen) standards went into effect January 1, 2026, which means buildings whose permit applications are applied for on or after January 1, 2026 must comply with the 2025 CALGreen standards.

Local

City of Santa Ana General Plan

The General Plan Conservation Element provides policies and programs for reducing energy consumption and increasing utilization of new energy sources within the City. Specifically, the Conservation Element focuses on reducing energy consumed with transportation, construction, and City operations. The General Plan Conservation Element includes the following goals and policies that are applicable to the proposed project.

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

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

Policy CN-1.4 Development Standards. Support new development that meets or exceeds standards for energy-efficient building design and site planning.

Policy CN-1.6 New and Infill Residential Development. Promote development that is mixed-use, pedestrian-friendly, transit oriented, and clustered around activity centers.

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

Policy CN-1.12 Sustainable Infrastructure. Encourage the use of low or zero emission vehicles, bicycles, non-motorized vehicles, and car-sharing programs by supporting new and existing development that includes sustainable infrastructure and strategies such as vehicle CN-charging stations, drop-off areas for ridesharing services, secure bicycle parking, and transportation demand management programs.

Policy CN-3.3 Development Patterns. Promote energy efficient-development patterns by clustering mixed use developments and compatible uses adjacent to public transportation.

Policy CN-3.4 Site Design. Encourage site planning and subdivision design that incorporates the use of renewable energy systems.

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

Policy CN-3.6 Life Cycle Costs. Encourage construction and building development practices that use renewable resources and life cycle costing in construction and operating decisions.

Policy CN-3.7 Energy Conservation Design and Construction. Incorporate energy conservation features in the design of new construction and rehabilitation projects.

Policy CN-3.11 Energy-Efficient Transportation Infrastructure. Continue to support public and private infrastructure for public transportation such as bus routes, rail lines, and the OC Streetcar.

Santa Ana Climate Action Plan

The *Santa Ana Climate Action Plan* (CAP) was adopted on December 15, 2015. The CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2008 levels by 2020 and 30 percent of 2008 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including transportation, land use, energy, solid waste, water, and wastewater. Reduction measures include developing residential nodes near retail and employment, implementing Title 24 energy efficiency standards for commercial and residential projects, installing solar photovoltaic systems on municipal buildings, and implementing AB 341, which requires diverting waste from landfills to reduce overall landfill waste.

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.

Project-Related Sources of Energy Consumption

Per CEQA Guidelines Appendix F, *Energy Conservation*, in order to ensure energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary energy consumption (Public Resources Code Section 21100(b)(3)). Environmental effects may include:

- The proposed project's energy requirements and its energy use efficiencies by amount and fuel type during demolition, construction, and operation; (Criterion 1)
- The effects of the proposed project on local and regional energy supplies; (Criterion 2)
- The effects of the proposed project on peak and base period demands for electricity and other forms of energy; (Criterion 3)
- The degree to which the proposed project complies with existing energy standards; (Criterion 4)
- The effects of the proposed project on energy resources; (Criterion 5) and
- The proposed project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable. (Criterion 6)

The impact analysis focuses on the two sources of energy that are relevant to the proposed project: electricity and transportation fuel for vehicle trips associated with project operations as well as the fuel necessary for project construction. The proposed project would be fully electric and would not consume natural gas (all proposed indoor and outdoor appliances would be fully electric); thus, the following analysis does not evaluate natural gas as an energy source. The California Emissions Estimator Model (CalEEMod) version 2022.1 was utilized to calculate the project's construction and operational energy consumption. The project's estimated electricity consumption is based primarily on CalEEMod's default settings for Orange County, and consumption factors provided by Southern California Edison (SCE), the electricity provider for the City, including the project site. The amount of operational fuel consumption was estimated using the CARB Emissions Factor 2021 (EMFAC2021) computer program which provides projections for typical daily fuel usage in the County, and the project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on the project's construction equipment list, construction timing and phasing, and duration of use of construction equipment. The project's estimated energy consumption is summarized in Table 4.6-1, *Project and Countywide Energy Consumption*. Refer to Appendix A, *Air Quality/GHG/Energy Data*, for CalEEMod output and energy calculations.

Table 4.6-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption[1]	Orange County Annual Energy Consumption[2]	Percentage Increase Countywide
Electricity Consumption[3]	297 MWh	19,225,145 MWh	0.0015%
Fuel Consumption			
Construction Off-Road (Equipment)[4]	32,003 gallons	47,637,141 gallons	0.0672%
Construction On-Road (Automotive)[5]	25,294 gallons	1,255,867,450 gallons	0.0020%
Operational On-Road (Automotive)[5]	54,869 gallons	1,236,325,315 gallons	0.0044%

Notes:
1. Project electricity consumptions as modeled in California Emissions Estimator Model Version 2022.1 (CalEEMod) computer model. Project fuel consumption calculated based on CalEEMod results.
2. The project's increase in electricity consumption is compared to the total consumption in Orange County in 2024 (the latest year where data is available). The project increases in construction off-road and on-road fuel consumption are compared with the projected Orange Countywide off-road fuel consumption and Countywide on-road fuel consumption in 2026 (first year of construction). The project increase in operational automotive fuel consumption is compared with the projected Countywide on-road fuel consumption in 2027 (project estimated operation year).
3. Electricity consumption data source: California Energy Commission, *Electricity Consumption*, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0, accessed September 22, 2025.
4. Off-road construction equipment diesel fuel consumption data source: California Air Resources Board, *Off-Road, Off-Road Emissions Inventory,* https://arb.ca.gov/emfac/offroad/emissions-inventory/34bb2b1684c9f6c2871c8137bc1cdf9e1a20c9b0, access September 22, 2025.
5. On-road fuel consumption data source: California Air Resources Board, *EMFAC, Emissions Inventory*, https://arb.ca.gov/emfac/emissions-inventory/134675fa4d39e5a02bd209657440a863badf0062, access September 22, 2025.

Source: Refer to Appendix A, *Air Quality/GHG/Energy Data* for CalEEMod outputs and assumptions used in this analysis.

As shown in Table 4.6-1, the project's electricity usage would constitute an approximate 0.0015 percent increase above the County's typical annual electricity consumption; off-road fuel consumption from construction equipment would increase the County's consumption by 0.0672 percent; and vehicle fuel consumption during construction and operation of the project would increase the County's consumption by 0.0020 percent and 0.0044 percent, respectively.

Construction-Related Energy Consumption

During construction, the proposed project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coating. As indicated in Table 4.6-1, the project's off-road fuel consumption and on-road fuel consumption from construction would be approximately 32,003 gallons and 25,294 gallons, respectively. Consequently, the project's off-road construction equipment diesel fuel consumption and on-road construction fuel consumption would increase County's consumption by 0.0672 percent and 0.0020 percent, respectively. As such, construction of the project would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations Section 2485). Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The integration of green building materials can help reduce environmental impacts associated with the extraction, transport, processing, fabrication, installation, reuse, recycling, and disposal of these building industry source materials. The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. Further, it is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand for energy resources (**Criterion 5**) and a less than significant impact would occur in this regard.

Operational Energy Consumption

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. According to the *Focused Traffic Study for 1st & Mountain View Residential Project* (Traffic Study), prepared by Linscott, Law & Greenspan, Engineers and dated September 23, 2025, the proposed project would generate approximately 379 total daily trips; refer to Appendix G, *Transportation Studies*. As indicated in Table 4.6-1, operational fuel consumption is estimated to be approximately 54,869 gallons per year, which would increase Countywide automotive fuel consumption by 0.0044 percent. As such, the project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside of the scope of the design of the proposed project. However, the project would include various design features that would promote the reduction of overall VMT generated from the proposed development, which reduces petroleum fuel consumption. Such features would include the installation of solar panels, energy efficient appliances, low water flow fixtures, water-efficient irrigation, and drought-tolerant landscaping. Additionally, building energy efficiency standards would be designed to exceed Title 24 standards.

The project is also located within close proximity to existing destinations and public transportation. According to the *Vehicle Miles Traveled (VMT) Analysis, 61 Townhouse Units, 4320 West First Street, Santa Ana California* (VMT Analysis), prepared by Blodgett Baylosis Environmental Planning and dated March 3, 2026, the proposed project is located within a half-mile buffer of a high-quality bus stop (at South Harbor Boulevard and West First Street intersection as well as North Euclid Street and West First Street intersection) as shown in the Santa Ana Transit Priority Areas Map; refer to Appendix G. As such, the project site is located within a transit priority area (TPA). Additionally, according to the VMT Analysis, the proposed project is located in a low VMT generating area (defined as traffic analysis zones [TAZs] with a total daily VMT/service population less than 15 percent below the Orange County average). Further, the project is located within walking distance to existing destinations along West First Street and Newhope Street that residents and guests may potentially visit, such as restaurants and commercial retail uses. Although the project would not provide electric vehicle (EV) charging spaces for guests, all garages proposed would include EV charging ready infrastructure. As such, the project's proximity to existing public transit and destinations would reduce overall VMT and would reduce petroleum fuel consumption. (**Criterion 4** and **Criterion 6**).

Therefore, fuel consumption associated with vehicle trips generated by the proposed project would not be considered inefficient, wasteful, or unnecessary compared to other similar developments in the region. A less than significant impact would occur in this regard.

Building Energy Demand

The CEC developed 2024 to 2040 forecasts for energy consumption and peak demand in support of the 2023 Integrated Energy Policy Report for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections. CEC forecasted baseline electricity consumption grows at a rate of about 1.7 percent annually through 2040.[1] The natural gas consumption grows at a rate of about 0.2 percent annually through 2035.[2]

As shown in Table 4.6-1, the combined operational energy consumption from the proposed project would represent approximately 0.0015 percent increase over the Countywide electricity consumption in 2024 (the latest year where data is available). The project would not consume natural gas during operation (all proposed indoor and outdoor appliances would be fully electric). The percentage increase in energy consumption would be significantly below CEC's forecast. Therefore, the proposed project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the proposed project would consume energy during the same time periods as other residential developments and would consume energy evenly throughout the day. As a result, the proposed project would not result in a unique or more intensive peak or base period electricity demand (**Criterion 3**).

The proposed project would be required to comply with the most current Title 24 standards. Title 24 provides minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Specifically, the proposed project would install solar panels, energy efficient appliances, low water flow fixtures, water-efficient irrigation, and drought-tolerant landscaping. These features were not included in the CalEEMod modeling for a conservative analysis. Title 24 Building Energy Efficiency Standards are updated every three years and become more stringent between each update. As such, complying with the most current Title 24 standards would make the proposed project more energy efficient. (**Criterion 4**).

The electricity provider for the City, SCE, is subject to California's Renewable Portfolio Standard (RPS) reflected in SB 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 52 percent by the end of 2027, 60 percent of total procurement by 2030, and 100 percent of total procurement by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects would not result in the waste of the finite energy resources (**Criterion 5**).

Conclusion

The project would adhere to all federal, State, and local requirements for energy efficiency. Additionally, the project would not result in a substantial increase in demand for electricity transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. Therefore, the proposed project would not cause wasteful, inefficient, and unnecessary consumption of energy during operation, or preempt future energy development or future energy conservation. A less than significant impact would occur in this regard.

1 California Energy Commission, *2023 Integrated Energy Policy Report, page 130*, February 14, 2024.

2 Based on the *2023 Integrated Energy Policy Report*, the gas forecast is updated every two years, in odd years. As such, the natural gas consumption shown here is based on the California Energy Commission, *Final 2022 Integrated Energy Policy Report Update, Figure 18*, May 10, 2023.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. The project would comply with the following applicable energy goals and measures identified in the City's CAP, as listed in Table 4.6-2, *Santa Ana Climate Action Plan Project Consistency Analysis*. The CAP contains energy efficiency goals and measures that would help implement energy efficient measures and subsequently reduce GHG emissions within the City. Compliance with the most recent Title 24 and CALGreen standards would ensure the project incorporates energy efficient windows, insulation, lighting, ventilation systems, and water efficient fixtures. Adherence to the most recent Title 24 energy requirements would ensure conformance with the State's goal of promoting energy and lighting efficiency and the City's CAP. Furthermore, the project would comply with General Plan Conservation Element goals and policies as described above. The proposed project would result in less than significant impacts associated with renewable energy or energy efficiency plans.

Table 4.6-2
Santa Ana Climate Action Plan Project Consistency Analysis

Santa Ana Climate Action Plan Measure	Consistency Analysis
Community-wide Energy Measures	
Solar Photovoltaic Systems — New Private Installs. This measure accounts for the impact of new private installations of solar photovoltaic (PV) systems in Santa Ana. Solar PV systems can lower energy costs for residents and businesses. In addition, having more PV systems connected to the grid leads to increased electric system reliability during peak demand periods and increased electric price stability.	**Consistent.** The project would comply with the latest Title 24 standards, which requires residential projects to install solar panels.
Title 24 Energy Efficiency Standards—Residential. Title 24 is the energy code that establishes the minimum energy efficiency standards for new construction in California. The code is set by the State and enforced locally by the City of Santa Ana through the building permit review and inspection process.	**Consistent.** The project would comply with and exceed the most current Title 24 standards. The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Further, the project would install solar panels on the proposed townhome units in accordance with existing CALGreen standards.
Source: City of Santa Ana, *Santa Ana Climate Action Plan*, December 2015.	

Mitigation Measures: No mitigation measures are required.

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4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) 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.				✓
2) Strong seismic ground shaking?		✓		
3) Seismic-related ground failure, including liquefaction?		✓		
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				✓
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

This section is primarily based on the following technical studies (refer to Appendix B, *Cultural Resources Assessment*, and Appendix C, *Geotechnical Investigation*):

- *Cultural and Paleontological Resources Assessment for the First & Mountain View Project, Santa Ana, Orange County, California* (Cultural Resources Assessment), prepared by Michael Baker International, dated February 26, 2026; and

- *Geotechnical Engineering Investigation – Proposed Residential Development 4320 W. 1st Street & 201 S. Mountain View Street, Santa Ana, California* (Geotechnical Investigation), prepared by NorCal Engineering, dated January 8, 2025.

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

1) 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.

No Impact. The project site, like the rest of Southern California, is located within a seismically active margin between the North American and Pacific tectonic plates. According to the Geotechnical Investigation, the project site is outside

of any Alquist Priolo Special Studies Zone and the potential damage from a direct fault rupture is unlikely. The closest fault, the Newport-Inglewood Fault Zone, is located approximately 6.2 miles southwest. There are no known active or potentially active faults trending toward or through the project site, and as discussed, the site is not within a currently designated Alquist-Priolo Earthquake Fault Zone. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

2) Strong seismic ground shaking?

Less Than Significant Impact With Mitigation Incorporated. Considering the proximity of the Newport-Inglewood Fault Zone, moderate to high ground shaking can be expected at the site during the design lifetime of the proposed residential development. Nevertheless, the project would be subject to existing seismic design requirements of the California Building Code as incorporated by reference in Municipal Code Chapter 8, Article II, *Building Code* as well as site-specific seismic design recommendations identified in the Geotechnical Investigation to minimize the potential for damage and major injury during a seismic event; refer to Section 8.0, *Conclusions and Recommendations*, of the Geotechnical Investigation. Specifically, the Geotechnical Investigation recommends that all foundations be designed utilizing an allowable bearing capacity of 2,000 pounds per square foot with additional bearing capacity for each additional foot of depth in excess of 18 to 24 inches. Additionally, it is recommended that building foundations, including floor slab areas, be underlain by a uniform compacted fill blanket at least two feet in thickness due to the potential for differential settlement of foundations placed on compacted fill and alluvium soils. Mitigation Measure GEO-1 would require the proposed project implement all geotechnical recommendations outlined in the Geotechnical Investigation. Upon implementation of Mitigation Measure GEO-1, impacts associated with strong seismic ground shaking, would be reduced to less than significant levels.

Mitigation Measures:

GEO-1 Prior to issuance of grading permits, the project applicant shall ensure the geotechnical recommendations outlined in the *Geotechnical Engineering Investigation – Proposed Residential Development 4320 W. 1st Street & 201 S. Mountain View Street, Santa Ana, California*, prepared by NorCal Engineering and dated January 8, 2025, related to soils grading, soil shrinkage and subsidence, temporary excavations, foundation design, soils settlement, lateral resistance, retaining wall design, slab design, utility trench and excavation backfill, corrosion design, and expansive soils, or an updated/finalized project-specific geotechnical investigation, are integrated into the project plans. The City of Santa Ana City Engineer shall verify the recommendations are included in the final project plans during final plan check review.

3) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact With Mitigation Incorporated. Liquefaction and seismically-induced settlement or ground failure is generally related to strong seismic shaking events where the groundwater occurs at shallow depth (generally within 50 feet of the ground surface) or where lands are underlain by loose, cohesionless deposits. Liquefaction typically results in the loss of shear strength of a soil, which occurs due to the increase of pore water pressure caused by the rearrangement of soil particles induced by shaking or vibration. During liquefaction, soil strata behave similarly to a heavy liquid.

According to the Geotechnical Investigation, historic shallow groundwater level at the project site is within the contours of less than 10 feet below ground surface (bgs). During the field exploration, groundwater was encountered on-site at depths varying from about nine to 10 feet bgs. Additionally, the project site is located within a liquefaction zone identified by the California Geological Survey; refer to Appendix C, *Liquefaction Analysis*, of the Geotechnical Investigation.

A seismic settlement calculation to determine the liquefaction potential at the project site was conducted; refer to Appendix C, *Liquefaction Analysis*, of the Geotechnical Investigation. Based on the calculation and groundwater depth, the potential of liquefaction at the project site is moderate to high. The Geotechnical Investigation recommends that

the proposed project utilize a stiffened foundation system to reduce potential seismic-induced settlement. Furthermore, the Geotechnical Investigation recommends that the stiffened foundation system consist of either a post-tensioned slab design, mat foundation, or a system of connecting grade beams that connect the foundations in two directions throughout the structures. Mitigation Measure GEO-1 would require the proposed project implement all geotechnical recommendations outlined in the Geotechnical Investigation. Upon implementation of Mitigation Measure GEO-1, impacts associated with seismic-related ground failure, including liquefaction, would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure GEO-1.

4) Landslides?

No Impact. The project site and surrounding area is generally flat. According to the Geotechnical Investigation, the site is not mapped within any landslide zone identified by the California Geological Survey; refer to Appendix C, *Liquefaction Analysis*, of the Geotechnical Investigation. Additionally, no upsloping hillside grade exists within close proximity of the site. Thus, the potential for seismically-induced landslides or debris flows, would not occur. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The primary concern in regard to soil erosion or loss of topsoil would be from construction activities associated with the project (e.g., earthwork and grading). Construction activities associated with the project would expose soils to short-term erosion by wind and water. However, as stated in Response 4.10(c)(1), the project would be subject to compliance with the best management practices identified in the project's Water Quality Management Plan and Stormwater Pollution Prevention Plan. For example, project construction would be required to retain eroded sediments and other pollutants on-site; protect stockpiles and other construction-related materials from being transported from the site by wind and/or water; stabilize construction roadways to inhibit sediments from being deposited into the public right-of-way; and stabilize any slopes with disturbed soils to inhibit erosion by wind and/or water, among others. Compliance with the project's Water Quality Management Plan and Stormwater Pollution Prevention Plan would ensure project construction results in less than significant impacts regarding soil erosion and the loss of topsoil.

Mitigation Measures: 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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact With Mitigation Incorporated. Refer to Responses 4.7(a)(3), 4.7(a)(4), and 4.7(d) for a discussion concerning liquefaction, landslides, and expansive soils, respectively.

Lateral spreading 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 a drainage or stream channel. However, ground failure from lateral spreading is generally analytically unpredictable, since it is difficult to determine where the first tension crack would occur. However, the project site is relatively far away from a free face. The nearest free face of the Santa Ana River Channel is approximately one mile to the east of the site. Nevertheless, according to the Geotechnical Investigation, the project site is located in an area of historic liquefaction occurrence. As such, geotechnical and groundwater conditions indicate there is a potential for permanent ground displacement. As discussed in Response 4.7(a)(3), the proposed project would implement Mitigation Measure GEO-1 which requires the proposed project to implement all geotechnical recommendations outlined in the Geotechnical Investigation, including

the recommended stiffened foundation system to reduce potential seismic-induced settlement. Implementation of the recommended features would reduce the probability of lateral spreading occurring on-site and impacts would be less than significant.

Subsidence can occur in various ways during an earthquake. Large areas of land can subside drastically during an earthquake because of offset along fault lines; land subsidence can also occur as a result of settling and compacting of unconsolidated sediment (i.e., settlement) from seismic shaking. Based on the Geotechnical Investigation, seismicity level at the project site is relatively low and subsurface soils are found to be medium dense, stiff. These soils are not likely to experience damaging settlement during a major seismic event. The maximum dynamic settlement at the site is approximately 0.29-inch; refer to Geotechnical Investigation Appendix C, *Liquefaction and Seismic Settlement Analysis*. The Geotechnical Investigation concluded that the integrity of the proposed townhome buildings would not be adversely impacted by subsidence, including settlement, upon conformance with the seismic design recommendations. Thus, with implementation of Mitigation Measure GEO-1, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure GEO-1.

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

No Impact. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements. Subsurface soils at shallow depths on-site (upper five feet) were identified as silty sand to sand. Borings to the depth of 35 feet identified subsurface soils to comprise of silty sand, sand, and sandy silt. Laboratory test results of the soil borings on-site indicated very low expansion potential; refer to Appendix B, *Laboratory Tests,* of the Geotechnical Investigation. Based on Section 1803.5.3 of the California Building Code, these on-site soils are considered non-expansive. Thus, impacts in this regard would not occur.

Mitigation Measures: 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. No septic tanks or alternative wastewater systems would be utilized for the proposed development. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. The project site has been graded in the past and was most recently developed to support the storage of commercial food trucks and food truck commissary operations. As part of the Cultural Resources Assessment, a review of available geological, geographical, and paleontological resources pertaining to the project area was conducted in online government and museum databases, a paleontological pedestrian survey of the project area was conducted, and a Natural History Museum of Los Angeles County Paleontological Database records search was requested for the project area and surrounding five-mile radius to determine whether the project could result in an adverse effect to paleontological resources. Due to the fossil sensitivity of the rock formations present within the project area (Holocene to Late Pleistocene age young alluvial fan deposits), there is a high potential to disturb paleontological resources within undisturbed geologic contexts (i.e., undisturbed bedrock or subsurface geologic deposits in previously undisturbed areas) within the project area. No paleontological resources are documented within the project area, but significant vertebrate and invertebrate fossil localities have been recovered from geologic formations of similar age (Pleistocene) and depositional environments

within nine miles of the project area. Due to the vertebrate and invertebrate fossils found in geologic units similar to those underlying the project area, the rock units presently underlying the site have a high sensitivity for paleontological resources at all depths due to its unknown geology. As such, Mitigation Measure GEO-2 would require an initial project review by a qualified paleontologist to determine the project's potential to impact paleontological resources. If ground-disturbing activities are not anticipated to impact paleontological resources, no further mitigation related to paleontological resources would be required. However, if the qualified paleontologist believes paleontological resources may be impacted by the project, paleontological monitoring would be required under Mitigation Measure GEO-3, and if any fossils are discovered during construction, the qualified paleontologist would be required to prepare and implement a data recovery plan under Mitigation Measure GEO-4. Additionally, Mitigation Measure GEO-5 would require a qualified paleontologist to conduct a worker environmental awareness training for all construction personnel prior to construction activities. Following implementation of Mitigation Measures GEO-2 through GEO-5, impacts would be less than significant.

Mitigation Measures:

GEO-2 Initial Project Review. Prior to the beginning of construction activities that may impact undisturbed native Holocene to Pleistocene-aged soil and bedrock (including, but not limited to, geotechnical boring, initial vegetation removal, clearing and grubbing, mass grading, boring, excavating, digging, trenching, rig anchor installation, drilling, boring/tunneling, auguring, blasting, topsoil stripping, land leveling, driving a ground rod, fencing and hydrovac excavating), the project applicant shall retain a Society of Vertebrate Paleontology-qualified paleontologist. The qualified paleontologist shall review the proposed scope of work, excavation plans against the data, and the analysis in the *Cultural and Paleontological Resources Assessment for the First & Mountain View Project, Santa Ana, Orange County, California*, prepared by Michael Baker International and dated February 26, 2026, to determine the potential to impact paleontological resources. If ground-disturbing activities are not anticipated to impact paleontological resources, then no further mitigation is required and Mitigation Measures GEO-3 and GEO-4 do not apply.

GEO-3 Paleontological Monitoring. As determined by the Society of Vertebrate Standards (SVP)-qualified paleontologist in consultation with the City of Santa Ana Planning Division, paleontological monitoring shall be required for all ground-disturbing activities that may impact undisturbed native Holocene to Pleistocene-aged soil and bedrock at any depth. The qualified paleontologist shall attend preconstruction meetings, as deemed necessary by the paleontologist in consultation with the City of Santa Ana Planning Division, and manage the paleontological monitor(s) if the qualified paleontologist is not conducting the monitoring. The paleontological monitor(s) shall maintain logs and provide a final summary report of all ground-disturbing activities monitored with the potential to disturb paleontological resources.

The level of monitoring may range from full-time or part-time (spot-check), based on the qualified paleontologist's review of plans and on-site observations. If no significant fossils are recovered after 50 percent of earth-moving activities is completed, full-time monitoring may be modified or reduced at the discretion of the qualified paleontologist. If the qualified paleontologist determines during the course of earth-moving activities that project excavations are located within fill or previously disturbed soils, or that the sensitivity for significant paleontological resources is otherwise low, monitoring may be reduced or suspended at the qualified paleontologist's discretion. The determination to reduce or discontinue paleontological monitoring in the project area shall be based on the professional opinion of the qualified paleontologist regarding the potential for fossils to be present after a reasonable extent of the geology and stratigraphy has been evaluated.

Monitoring shall be conducted in person by a qualified paleontological monitor as stated in the SVP 2010 guidelines. The monitor shall take photographs, and write a daily log which describes work monitored, depth, conditions, findings, etc., for the day. These logs shall be collected daily or weekly and compiled into the project monitoring report at the end of the project. If multiple areas of the project site are being impacted at

the same time, multiple monitors may be required in order to fulfill the mitigation measures that reduce impacts to these resources, if any, to a less than significant level.

In the event that fossils are discovered during grading at any depth, the on-site construction supervisor shall be notified immediately and shall redirect work away from the location of the discovery. The contractor shall consult with the qualified paleontologist to assess the significance of the find in accordance with SVP standards. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified paleontologist and approved by the City of Santa Ana Planning Division shall be followed. If avoidance is unnecessary or infeasible, then Mitigation Measure GEO-4 shall be implemented. The recommendations of the paleontologist shall be implemented with respect to the evaluation and recovery of fossils, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the fossil discovery. If any find is determined not to be significant, then work shall proceed and Mitigation Measure GEO-4 does not apply.

GEO-4 Data Recovery Plan. If the fossils are determined to be significant, then the Society of Vertebrate Paleontology-qualified paleontologist shall prepare and implement a data recovery plan. The plan shall generally detail the nature and purpose of the paleontological investigation. The plan shall incorporate resource context, appropriate field methods for data collection depending on the type of fossils found, and detail how the fossils will be prepared, cleaned, identified, catalogued, temporarily housed, and permanently curated with an appropriate institution with a research interest in the materials (which may include the Natural History Museum of Los Angeles County or the John D. Cooper Center in the City of Santa Ana). The qualified paleontologist shall ensure that curation of fossils is completed in consultation with the City of Santa Ana Planning Division. A letter of acceptance from the curation institution shall be submitted to the City of Santa Ana Planning Division.

Ground-disturbing construction activities may commence once excavations are completed in accordance with the data recovery plan and to the satisfaction of the City in consultation with the qualified paleontologist. However, the data recovery work shall not be considered complete until excavations and associated analyses are completed and a final report is prepared. The report shall be completed and presented to the City of Santa Ana Planning Division for comment within 18 months of the completion of excavations.

GEO-5 Worker Environmental Awareness Program. As determined by the Society of Vertebrate Paleontology (SVP)-qualified paleontologist in consultation with the City of Santa Ana Planning Division, and prior to the beginning of the earth-moving construction activities (including, but not limited to, geotechnical boring, initial vegetation removal, clearing and grubbing, mass grading, boring, excavating, digging, trenching, rig anchor installation, drilling, boring/tunneling, auguring, blasting, topsoil stripping, land leveling, driving a ground rod, fencing and hydrovac excavating), the construction crew shall be informed on how to identify paleontological localities, such as fossils, and of the regulatory protections afforded those resources by a SVP-qualified paleontologist. The crew shall also be informed of procedures relating to the discovery of unanticipated paleontological resources. The crew shall be cautioned not to collect fossils, and directed to inform a construction supervisor and the on-site paleontological monitor, if available, in the event that paleontological resources are discovered during the course of construction. The qualified paleontologist shall administer supplemental briefings to all new construction personnel, prior to their commencement of earth-moving construction activities. This mitigation measure can be administered in conjunction with other construction worker environmental awareness programs for the proposed project.

4.8 GREENHOUSE GAS EMISSIONS

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

Global Climate Change

California is a substantial contributor of global GHGs, emitting approximately 371.1 metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2022.[1] A carbon dioxide equivalent is defined as the number of metric tons of CO_2 emissions with the same global warming potential as one metric ton of another GHG. Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of September 2025, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 423.72 ppm.[2]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm CO_2 equivalent (CO_2e) concentration[3] is required to keep global mean warming below 2 degrees Celsius (^oC), which in turn is assumed to be necessary to avoid dangerous climate change.

1 California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2022, Trends of Emissions and Other Indicators,* September 20, 2024.

2 Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed September 22, 2025.

3 Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Regulatory Framework

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020, and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency's (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence, the EPA found that six GHGs (CO_2, CH_4, N_2O, hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [SF_6]) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Clean Air Act and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

State

Executive Order S-3-05

Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The Executive Order directed the California Environmental Protection Agency (Cal/EPA) Secretary to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary is required to submit biannual reports to the Governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with Executive Order S-3-05, the Cal/EPA Secretary created the California Climate Action Team, made up of members from various State agencies and commissions. The Climate Action Team released its first report in March 2006, which proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

Executive Order S-13-08

Executive Order S-13-08 seeks to enhance the State's management of climate impacts including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of State's first climate adaptation strategy. This will result in consistent guidance from experts on how to address climate change impacts in California.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500-38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to Assembly Bill (AB) 1493 (Pavley Bill) should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Senate Bill 375

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities' strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, is required to provide each affected region with GHG reduction targets emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets are to be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding.

Senate Bill 32

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

CARB Scoping Plan

On December 11, 2008, CARB adopted its *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California will implement to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions levels of 596 million $MTCO_2e$ under a business as usual (BAU) scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, and requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from the past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, industrial, commercial, and residential). CARB used three-year average emissions, by sector, from 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce projected 2020 BAU emissions to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal."

On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update was finalized in November 2017 and approved on December 14, 2017, and reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. The 2017 Scoping Plan Update establishes a new Statewide emissions limit of 260 million $MTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

On December 15, 2022, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under 2022 Scoping Plan, by 2045, California aims to cut GHG emissions by 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, this plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the State's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

California Building Energy Efficiency Standards (Title 24)

The California Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Part 6 of Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The latest Title 24 (2022 Title 24) standards took effect on January 1, 2023. The California Energy Commission updates the standards every three years. As such, buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 Title 24 (2025 Energy Code). The 2025 Energy Code would expand on the existing 2022 Title 24 standards (i.e., promote the use of heat pumps in new residential development, electrical readiness, updated ventilation standards, etc.).

California Green Building Standards (CALGreen)

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of GHG emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials. [4] Any building permit applications applied on or after January 1, 2026 would be required to comply with the upcoming 2025 California Green Building Standards Code.

Local

City of Santa Ana General Plan

The Santa Ana General Plan includes the following goals and policies related to GHGs that would be applicable to the proposed project:

GOAL CN-1 AIR QUALITY AND CLIMATE: Protect air resources, improve regional and local air quality, and minimize the impacts of climate change.

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

Policy CN-1.4 Development Standards: Support new development that meets or exceeds standards for energy-efficient building design and site planning.

Policy CN-1.6 New and Infill Residential Development: Promote development that is mixed-use, pedestrian-friendly, transit oriented, and clustered around activity centers.

[4] U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed September 22, 2025.

Policy CN-1.7 Housing and Employment Opportunities: Improve the City's jobs/housing balance ratio by supporting development that provides housing and employment opportunities to enable people to live and work in Santa Ana.

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

Policy CN-1.12 Sustainable Infrastructure: Encourage the use of low or zero emission vehicles, bicycles, non-motorized vehicles, and car-sharing programs by supporting new and existing development that includes sustainable infrastructure and strategies such as vehicle charging stations, drop-off areas for ridesharing services, secure bicycle parking, and transportation demand management programs.

GOAL CN-3 ENERGY RESOURCES: Reduce consumption of and reliance on nonrenewable energy, and support the development and use of renewable energy sources.

Policy CN-3.4 Site Design: Encourage site planning and subdivision design that incorporates the use of renewable energy systems.

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

Policy CN-3.7 Energy Conservation Design and Construction: Incorporate energy conservation features in the design of new construction and rehabilitation projects.

GOAL CN-4 WATER RESOURCES: Conserve and replenish existing and future water resources.

Policy CN-4.1 Water Use: Encourage and educate residents, business owners, and operators of public facilities to use water wisely and efficiently.

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

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

GOAL M-5 SUSTAINABLE TRANSPORTATION DESIGN: A transportation system that is attractive, safe, state-of-the-art, and supports community, environmental, and conservation goals.

Policy M-5.6 Clean Fuels and Vehicles: Encourage the use of alternative fuel vehicles and mobility technologies through the installation of supporting infrastructure.

Santa Ana Climate Action Plan

CARB encourages local governments to adopt a reduction goal for emissions from municipal operations and move toward establishing goals for community emissions that parallel the State's commitment to reducing GHG emissions. CEQA Guideline Section 15183.5 provides that a lead agency may analyze and mitigate significant effects of GHG emissions at a programmatic level (e.g., in a plan targeted to reduce GHG emissions). Subsequent projects may be able to tier off the environmental analysis for an adopted climate action plan to determine that a project's incremental

contribution to the cumulative effect of GHG emissions is not cumulatively considerable so long as the project complies with the adopted plan and mitigation program.

The *Santa Ana Climate Action Plan* (CAP) was adopted on December 15, 2015. The CAP includes a GHG emissions inventory as well as the following reduction targets for community-wide emissions: 15 percent of 2008 levels by 2020 and 30 percent of 2008 levels by 2035. The CAP outlines GHG reduction measures for various sectors, including transportation, land use, energy, solid waste, water, and wastewater. Reduction measures include developing residential nodes near retail and employment, implementing Title 24 energy efficiency standards for commercial and residential projects, installing solar photovoltaic systems on municipal buildings, and implementing AB 341, which requires diverting waste from landfills.

Although it was determined that implementation of CAP emissions reduction measures would achieve the reduction target for 2020, the measures would fall short of achieving the City's 2035 target. The City notes in its staff report that in coming years, as the CAP is reviewed and revised, measures will be implemented to achieve the 2035 target.[5] The CAP includes monitoring and a target for tracking progress with re-inventorying at later dates.

A critical aspect of having a CAP that fits the criteria within CEQA Guidelines Section 15183.5 is to have reduction targets that align with Statewide goals. The CAP's 2020 reduction target (i.e., below baseline emission levels) parallels the State's commitment to reducing GHG emissions under AB 32. However, it proceeds even further by identifying targets that are specific to the City's geographic location as well as activity types and their associated sources. Therefore, because the CAP's 2020 target aligns with the Statewide goal for 2020 (i.e., achieving 1990 levels), the CAP is consistent with AB 32. Through 2020, the CAP is a qualifying plan under CEQA Guidelines Section 15183.5. However, although the City projects emissions and quantifies reductions to achieve the CAP's 2035 emissions target, the CAP does not achieve the requisite reductions. Moreover, the CAP's 2035 target does not fully align with Statewide targets. For example, the Statewide target for 2030 (as codified in SB 32) is 40 percent below 1990 levels and the 2050 target (not yet codified) is 80 percent below 1990 levels. The CAP's 2035 target of 1,371,602 $MTCO_2e$ is only 18 percent below the 2020 target of 1,665,516 $MTCO_2e$ (i.e., 1990 levels). This level of reduction is not enough to achieve a fair share contribution toward the Statewide targets of 40 percent and 80 percent below 1990 levels by 2030 and 2050, respectively. Therefore, as the City's CAP does not align with Statewide goals beyond 2020, the CAP is not consistent with the criteria within CEQA Guidelines Section 15183.5 for the post-2020 period.

Thresholds of Significance

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends certain factors to be considered in the determination of significance (i.e., the extent to which a project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the

[5] City of Santa Ana, *City Council and Housing Authority Meetings (incl. staff reports)*, December 1, 2015, https://santaana.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=539, accessed September 22, 2025.

context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064(h)(3)).[6,7] A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.[8]

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the South Coast Air Quality Management District (SCAQMD), CARB, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. The primary purpose of quantifying the project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from 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?

Less Than Significant Impact.

Project-Related Sources of Greenhouse Gases

Project-related GHG emissions include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO_2, N_2O, and CH_4, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. The California Emissions Estimator Model version 2022.1 (CalEEMod) relies upon project specific land use data and trip generation rates from the *Focused Traffic Study for 1st & Mountain View Residential Project* (Traffic Study), prepared by Linscott, Law & Greenspan, Engineers and dated September 23, 2025; refer to Appendix G, *Transportation Studies*. Table 4.8-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO_2, N_2O, and CH_4 emissions associated with the proposed project; refer to Appendix A, *Air Quality/GHG/Energy Analysis* for the CalEEMod outputs.

6 California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16, December 2009, https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed September 22, 2025.

7 State of California Governor's Office of Planning and Research, *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency*, April 13, 2009, https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf, accessed September 22, 2025.

8 14 CCR Section 15064(h)(3).

Table 4.8-1
Estimated Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	Refrigerants	CO_2e[2]
	Metric Tons/year				
Direct Emissions					
Construction (amortized over 30 years)	18.55	< 0.01	< 0.01	< 0.01	18.71
Mobile Source	335.44	0.02	0.01	0.46	340.63
Area Source	1.05	< 0.01	< 0.01	0.00	1.05
Refrigerants	0.00	0.00	0.00	0.12	0.12
Total Direct Emissions[1]	*355.04*	*0.02*	*0.01*	*0.59*	*360.51*
Indirect Emissions					
Energy	46.58	< 0.01	< 0.01	0.00	46.85
Water	3.51	0.07	< 0.01	0.00	5.92
Waste	4.03	0.40	0.00	0.00	14.10
Total Indirect Emissions[1]	*54.12*	*0.48*	*0.00*	*0.00*	*66.87*
Project Total Emissions (All Sources)	**427.37 $MTCO_2e$ per year**				

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent
1. Totals may be slightly off due to rounding.
2. CH_4 and N_2O have a higher global warming potential (GWP) when compared to CO_2. Specifically, the GWP of CH_4 is approximately 27.9 and N_2O is approximately 273. To evaluate these gases as carbon dioxide equivalent (CO_2e), the mass of CH_4 and N_2O is multiplied by their corresponding GWP.

Source: Refer to Appendix A, *Air Quality/GHG/Energy Analysis* for assumptions used in this analysis.

Construction Emissions

Construction sources of GHG emissions include GHG emissions from construction equipment operation on-site and construction worker vehicle trips to and from the project site, and from construction material deliveries to and from the project site. Construction input data for CalEEMod include, but are not limited to, (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; and (3) trips associated with construction activities (i.e., hauling, vendor, and worker trips). Construction GHG emissions were quantified by estimating the types and quantity of equipment that would be used on-site during each construction phase, as provided by the model defaults. CalEEMod also includes off-site GHG emissions from worker, vendor, and hauling truck trips. Construction of the proposed project is anticipated to take approximately 15 months and would require approximately 5,833 cubic yards of soil import. The default number of trips and lengths were used for worker and vendor trips. Hauling trip length was adjusted based on project Applicant-provided information; number of hauling trips were default. Project construction would consist of demolition, grading, building construction, paving, and the application of architectural coatings.

Construction GHG emissions are amortized (i.e., total construction emissions divided by the lifetime of the project, assumed to be 30 years),[9] then added to the operational emissions. As shown in Table 4.8-1, construction of the proposed project would result in a total of 18.71 $MTCO_2e$ per year when amortized over 30 years. This would represent a total of approximately 561.16 $MTCO_2e$ from all construction activities.

Mobile Source Emissions

Mobile source GHG emissions are estimated by multiplying the project's total VMT by the vehicle emission factors. The vehicle emission factors were CalEEMod default values for the Orange County. Project-generated vehicle emissions have been estimated using CalEEMod. Based on the Traffic Study, the project would generate a total of 379

9 In accordance with the SCAQMD guidance, projected GHGs from construction have been quantified and amortized over 30 years, which is the number of years considered to represent the life of the project. The amortized construction emissions are added to the annual average operational emissions.

average daily trips (ADT); refer to Appendix G. As such, this analysis assumes a conservative approach by including emissions from mobile sources that currently exist on-site. The proposed project would result in approximately 340.63 $MTCO_2e$ per year of mobile source-generated GHG emissions; refer to Table 4.8-1.

Area Source

GHG emissions associated with area sources include consumer products, landscape maintenance, and architectural coating. Area source GHG emissions were calculated using standard emission rates from CARB, EPA, SCAQMD, and CalEEMod model defaults. As shown in Table 4.8-1, the proposed project would result in approximately 1.05 $MTCO_2e$ per year of area source-generated GHG emissions.

Refrigerants

Refrigerants are substances used in equipment for air conditioning and refrigeration. Most of the refrigerants used today are hydrochlorofluorocarbons (HFCs) or blends thereof, which can have high global warming potential (GWP) values. All equipment that use refrigerants have a charge size (i.e., quantity of refrigerant the equipment contains), and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. The proposed project would result in approximately 0.12 $MTCO_2e$ per year of GHG emissions from refrigerants; refer to Table 4.8-1.

Energy Consumption

Energy consumption emissions were calculated using CalEEMod and project-specific land use data. SCE would provide electricity to the project site; no natural gas would be used for the project. According to the project applicant, the proposed townhomes would install solar panels on rooftops and units would consist of energy-efficient appliances. Additionally, building energy efficiency standards would be designed to exceed Title 24 standards. The project would indirectly result in 46.85 $MTCO_2e$ per year of GHG emissions due to energy consumption; refer to Table 4.8-1.

Water Demand

Water consumption from the proposed project was calculated using CalEEMod default values for the site, and emissions associated with transporting these outdoor and indoor water are quantified. Emissions from indirect energy impacts due to water supply would result in 5.92 $MTCO_2e$/year; refer; refer to Table 4.8-1.

Solid Waste

CalEEMod quantifies GHG emissions associated with solid waste in landfills. Solid waste associated with operations of the proposed project would result in 14.10 $MTCO_2e$ per year; refer to Table 4.8-1.

Conclusion

As shown in Table 4.8-1, the total amount of project-related GHG emissions from direct and indirect sources combined would total 427.37 $MTCO_2e$ per year.

Consistency with Applicable GHG Plans, Policies, or Regulations

The GHG plan consistency analysis for the project is based on the project's consistency with SCAG's 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS), CARB's 2022 Scoping Plan, and the City's CAP. The 2020-2045 RTP/SCS is a regional growth management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2020-2045 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2022 Scoping

Plan describes the approach California will take to reduce GHG emissions by 40 percent below 1990 levels by the year 2030. The CAP outlines GHG reduction measures for various sectors, including transportation, land use, energy, solid waste, water, and wastewater. Reduction measures include developing residential nodes near retail and employment, implementing Title 24 energy efficiency standards for commercial and residential projects, installing solar photovoltaic systems on municipal buildings, and implementing AB 341, which requires diverting waste from landfills.

SCAG 2020-2045 RTP/SCS Consistency Analysis

The latest 2024-2050 RTP/SCS was adopted on April 4, 2024. However, CARB concluded that the technical methodology SCAG used to quantify the GHG emission reductions for the 2024-2050 RTP/SCS does not operate accurately. SCAG resubmitted the Sustainable Communities Strategy (SCS) Submittal Package for CARB's review in June 2024. Review by CARB is limited to acceptance or rejection of SCAG's determination that its SCS would, if implemented, achieve the region's GHG emission reduction target. If CARB rejects SCAG's determination of meeting the GHG emission target, SCAG will need to revise the SCS or adopt an alternative planning strategy demonstrating the ability to achieve the target. As such, until CARB makes the decision, 2024-2050 RTP/SCS is not a fully adopted document and is potentially subject to further updates, especially from the GHG reduction perspective of the methods and assumptions of the calculation of Auto Operating Costs (AOC), induced travel, electric vehicle incentives, job center parking and parking deregulation, off-model strategy assumptions, and emissions factors. As CARB has not made the decision at the time of preparation of this document, the consistency analysis relies upon the 2020-2045 RTP/SCS. Table 4.8-2, *2020-2045 RTP/SCS Project Consistency Analysis*, shows the project's consistency with the five strategies found within the 2020-2045 RTP/SCS. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 4.8-2
2020-2045 RTP/SCS Project Consistency Analysis

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green**	Consistent. According to the *Vehicle Miles Traveled (VMT) Analysis, 61 Townhouse Units, 4320 West First Street, Santa Ana California* (VMT Analysis), prepared by Blodgett Baylosis Environmental Planning and dated October 8, 2025, the proposed project is located within a half-mile buffer of a high-quality bus stop as shown in on the City's Transit Priority Areas Map; refer to Appendix G. Specifically, Orange County Transportation Administration (OCTA) serves the project with the eastbound Route 64 bus stop located approximately 93 feet west of the project site at West First Street/Newhope Street, and the eastbound Route 64 bus stop located approximately 436 feet northwest of the project site also at West First Street/Newhope Street. As such, the project site is located within a transit priority area (TPA). Additionally, according to the VMT Analysis, the proposed project is located in a low VMT generating area (defined as traffic analysis zones [TAZs] with a total daily VMT/service population less than 15 percent below the Orange County average). Further, the project is located within walking distance to existing destinations along West First Street and Newhope Street that residents and guests may potentially visit, such as restaurants and commercial retail uses. Although the project would not
• Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets		
• Plan for growth near transit investments and support implementation of first/last mile strategies		
• Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses		
• Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods		
• Encourage design and transportation options that reduce the reliance on and number of solo car trips (this		

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
could include mixed uses or locating and orienting close to existing destinations)	**Region, Urban Greening.**	provide electric vehicle (EV) charging spaces for guests, all garages proposed would be wired to support the potential installation of EV charging. Therefore, the project would focus growth near destinations and mobility options.
• Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)		
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement	**PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.**	Consistent. The project would develop the currently vacant/underutilized commercial site to provide 61 for-sale townhome units, five percent of which would be Very Low-Income units.
• Identify funding opportunities for new workforce and affordable housing development		Not Applicable. This strategy only pertains to governmental agencies and would not be applicable to development projects.
• Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply		Not Applicable. This strategy only pertains to governmental agencies and would not be applicable to development projects.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles (EV), shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space	**HQTA, TPAs, NMA, Livable Corridors.**	Consistent. As detailed above, the project site is located within a TPA and a low VMT generating area where public transportation is available. Specifically, the OCTA eastbound Route 64 bus stop located approximately 93 feet west of the project site at West First Street/Newhope Street, and the eastbound Route 64 bus stop located approximately 436 feet northwest of the project site also at West First Street/Newhope Street. The proposed project would also include bicycle parking spaces in accordance with Title 24 standards. Although the project would not provide EV charging spaces for guests, all garages proposed would be wired to support the potential installation of EV charging. Therefore, the project would promote low emission technologies.
• Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments		Not Applicable. This strategy focuses on SCAG's support on technology which may reduce VMT or allow for easier access to transportation options.
• Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation		Not Applicable. This strategy focuses on SCAG's support on promoting "micro-power grids".
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions	**Center Focused Placemaking, PGA, Job Centers, HQTAs, TPA,**	Consistent. As previously discussed, the proposed project would be located close to bus stops which would promote alternative modes of transportation. Additionally, the project would provide bicycle parking spaces and all garages would be wired to support the potential installation of EV charging. The project would include outdoor areas with landscaped planters, trees, recreational

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
	NMAs, Livable Corridors, SOIs, Green Region, Urban Greening.	facilities, and seating. Further, the project would comply with sustainable practices included in the most recent CALGreen Code and Title 24 standards. Thus, the project would be consistent with this reduction strategy.
• Support Statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations		Not Applicable. This strategy focuses on SCAG's support on Statewide legislation.
• Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space		Not Applicable. This strategy focuses on SCAG's support of local jurisdictions to establish financing tools for sustainable infrastructure.
• Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies		Consistent. The project would comply with sustainable practices included in the most recent CALGreen Code and Title 24 standards. Thus, the project would be consistent with this reduction strategy.
• Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region		Not Applicable. This strategy focuses on SCAG's support of local planning organizations.
• Continue to support long range planning efforts by local jurisdictions		Not Applicable. This strategy focuses on SCAG's support of local jurisdictions long range planning efforts.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards	**Green Region, Urban Greening, Greenbelts and Community Separators.**	Not Applicable. This strategy focuses on SCAG's support of local climate and hazard mitigation plans.
• Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration		Consistent. As discussed, the proposed project would install solar panels on rooftops that could supplement potential energy demand.
• Integrate local food production into the regional landscape		Not Applicable. This strategy focuses on incorporation of food production (community gardens) into the regional landscape.
• Promote more resource efficient development focused on conservation, recycling and reclamation		Consistent. As discussed, the project would comply with sustainable practices included in the most recent CALGreen and Title 24 standards. The project would also comply with local and regional regulations for recycling and composting.

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
• Preserve, enhance and restore regional wildlife connectivity		Consistent. The project is located within an urbanized and built environment with no existing regional wildlife corridors in the area; refer to Section 4.4, *Biological Resources*.
• Reduce consumption of resource areas, including agricultural land		Consistent. The project is located within an urbanized and built environment. Project development would not remove any agricultural land; refer to Section 4.2, *Agriculture and Forestry Resources*.
• Identify ways to improve access to public park space		Consistent. The project is a residential development project and would not involve public park space or affect access to public park space; refer to Section 4.16, *Recreation*. Further, open space areas are proposed within the proposed development; refer to Exhibit 2-3, *Conceptual Site Plan*. Specifically, a central open space/picnic area is proposed with amenities, including a pedestal barbecue and hot coal grill, picnic table, trash and recycling receptacles, a pedestrian bench, and bike racks. Additionally, an elevated corner plaza with enhanced paving and raised planter boxes is proposed in the northwest corner of the site adjacent to the proposed live/work units. Furthermore, a meandering walkway with benches would be constructed along the southern project boundary to provide pedestrian access to the southern residential buildings.
Source: Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.		

2022 Scoping Plan Consistency Analysis

The CARB *2022 Scoping Plan* (2022 Scoping Plan) identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each Assembly Bill 32 (AB 32) inventory sector. Provided in Table 4.8-3, *2022 Scoping Plan Project Consistency Analysis*, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

Table 4.8-3
2022 Scoping Plan Project Consistency Analysis

Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	Consistent. As previously stated, the project is located within close proximity to existing destinations and public transportation. According to the VMT Analysis, the proposed project is located within a TPA and a low VMT generating area; refer to Appendix G. Further, the project is located within walking distance to existing destinations along West First Street and Newhope Street that residents and guests may potentially visit, such as restaurants and commercial retail uses. Although the project would not provide EV charging spaces for guests, all garages would be wired for future EV charging. As detailed in Section 4.17, *Transportation*, the project would result in a less than significant VMT impact.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial),	Consistent. The proposed townhomes would utilize all-electric appliances, and no natural gas use is proposed.

Actions and Strategies	Project Consistency Analysis
contributing to 6 million heat pumps installed statewide by 2030	
Construction Equipment	
Achieve 25% of energy demand electrified by 2030 and 75% electrified by 2045	Not Applicable. It should be noted that project construction would be completed prior to 2030. As such, the project would not be required to have 25 percent of construction equipment energy demand electrified. Additionally, the City of Santa Ana has not adopted an ordinance or program requiring electricity-powered construction equipment which would be consistent with the 2022 Scoping Plan. However, if such programs or ordinances are adopted in the future, the project would be required to comply with the applicable goals or policies requiring the use of electric construction equipment in the future.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	Consistent. SB 1383 establishes targets to achieve a 50 percent reduction in the level of Statewide disposal of organic waste to a 75 percent reduction by 2025. The law establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. The project would comply with local and regional regulations and recycle or compost 75 percent of waste by 2025 pursuant to SB 1383.
Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.	

Santa Ana Climate Action Plan Consistency Analysis

The City of Santa Ana has developed a CAP to provide a framework for reducing GHG emissions. As part of the CAP, the City of Santa Ana has established a GHG reduction target of a 30 percent Citywide reduction from baseline by 2035. The CAP contains a GHG inventory, which identifies the largest sources of GHG emissions and thereby provides a basis for the development of strategies for achieving the reduction goal. Measures provided on the CAP were developed to provide City-initiated actions instead of project level measures that would be adopted by individual projects. Nonetheless, as demonstrated in Tables 4.8-2 and 4.8-3 above, the project would be consistent with the 2020-2045 RTP/SCS and the 2022 Scoping Plan. As such, it can be inferred that the project would be consistent with the City's CAP. The project would also be required to comply with the most recent Title 24 and CALGreen standards; according to the project applicant, building energy efficiency standards would be designed to exceed Title 24 standards. The proposed townhomes would install solar panels, energy efficient appliances, low water flow fixtures, water-efficient irrigation, and drought-tolerant landscaping. Furthermore, although the proposed project would require a General Plan Amendment and a Zone Change, implementation of the project would develop the currently vacant/underutilized site to provide 61 for-sale townhome units, five percent of which would be Very Low-Income units. As such, the project be consistent with the land use goals of the City's General Plan Housing Element to provide needed housing in the City. As such, the project would align with the City's goals in regard to GHG reduction, and impacts would be less than significant in this regard.

Conclusion

Overall, the project would be consistent with SCAG's 2020-2045 RTP/SCS, CARB's 2022 Scoping Plan, and the City's CAP. As such, the project would result in less than significant GHG impacts.

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4.9 HAZARDS AND HAZARDOUS MATERIALS

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

This section is primarily based upon the following technical studies (refer to Appendix D, *Phase I and II ESAs*):

- *Phase I Environmental Site Assessment, 201 South Mountain View Street and 4320 West 1st Street, Santa Ana, California* (Phase I ESA), prepared by Roux Associates, Inc., dated March 11, 2025; and
- *Phase II Subsurface Investigation Report, 201 South Mountain Avenue/4320 West 1st Street, Santa Ana, California* (Phase II Report) prepared by Roux Associates, Inc., dated March 12, 2025.

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. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Construction

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, and transmission fluid). The level of risk associated

with the routine transport, use, or disposal of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures including proper handling of hazardous materials, refueling vehicles off-site, maintaining proper storage containers, and installing best management practices (BMPs) that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law including the Hazardous Waste Control Act, California Division of Occupational Safety and Health (Cal/OSHA) requirements, Resources Conservation and Recovery Act (RCRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA). Compliance with existing laws and regulations would ensure impacts in this regard would be less than significant.

Operations

Hazardous materials are not typically associated with residential uses. Project operations may include small amounts of fuels and solvents for landscape maintenance equipment and/or common household purposes. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Impacts concerning the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.

Mitigation Measures: 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 With Mitigation Incorporated.

Construction

One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, hazardous substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure of contaminated soil, soil gas, or water can have potential health effects depending on a variety of factors, including the nature of the contaminant and the degree of exposure.

Construction Equipment

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. Further, as stated above under Response 4.9(a), all project construction activities would be required to demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are handled in an appropriate manner. Compliance with existing regulations would ensure impacts in this regard would be less than significant.

Grading Activities

Construction activities could also result in accidental conditions involving existing on-site contamination. The following analysis considers past uses of the project site, including historical agricultural and commercial activities, that may have impacted soil, soil gas, and/or groundwater underlying the project site.

Historical Agricultural Use

Based on the Phase I ESA, the project site was used for agricultural purposes from at least 1938 through the early 1960s (row crops and orchards). Based on the long-term agricultural use, it is possible that agricultural chemicals, such as organochlorine, lead-based, and arsenic-based pesticides, herbicides, and fertilizers, may have been used on-site. The Phase I ESA thus concluded that historical agricultural uses on-site may have contaminated on-site soils.

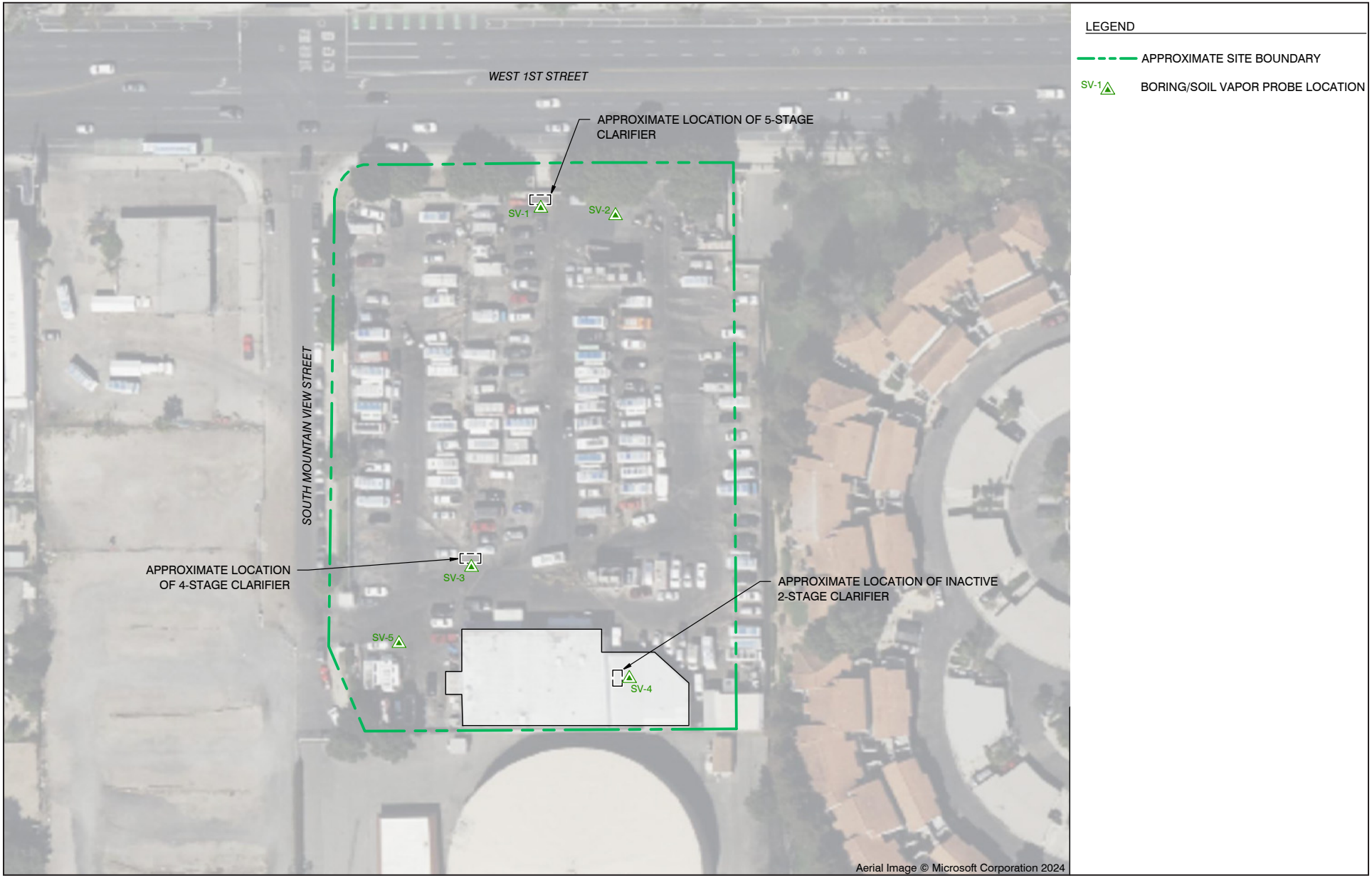
As such, a Phase II subsurface site investigation, as documented in the Phase II Report, was conducted to determine if the shallow soils on-site (0.5-feet below ground surface [bgs]) have been impacted by organochlorine pesticides (OCPs). Results of the soil samples analyses indicated that no OCPs were detected above applicable screening levels including the United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) and the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note 3 screening levels (SLs) for residential soil. Additionally, no heavy metals were detected above laboratory reporting limits with the exception of arsenic, the concentration of which is consistent and well below the Southern California ambient concentration for arsenic of 12 milligram per kilogram (mg/kg). Based on the soil sampling results, the Phase II Report determined that there are no indications that soil quality has been affected by the historical agriculture use of the site, and no mitigation action would be required for shallow soils.

Historical Commercial Use

Based on the Phase I ESA, the site has been used for commercial purposes from 1965 to April 2025. In 1965, the northwest portion of the project site was improved with a commercial building that served as a union hall; this commercial building was demolished in 1996. The existing commercial/industrial building developed along the southern boundary of the site was constructed in 1977 and modified at least once prior to 2005. The project site has since been occupied in a similar capacity until April 2025 (a food truck storage and commissary).

Based on the site reconnaissance conducted on November 25, 2024 as part of the Phase I ESA investigations, a five-stage clarifier with two associated drains was noted in the northern-central portion of the project site, and a four-stage clarifier with an associated drain was noted near the central portion of the project site immediately north of the on-site structure; refer to Exhibit 4.9-1, *Subsurface Investigation Sampling Locations*. Additionally, an inactive two-stage wastewater clarifier with associated drain was noted in the eastern portion of the on-site commercial structure. Clarifiers are concrete boxes, often referred to as oil-water separators, which are used for disposal of wastewater and fluids associated with repair activities. As such, these clarifiers were presumably used for stormwater discharge and/or wastewater discharge from the food truck equipment wash down. No regulatory agency records associated with these features were provided. Subsequently, a Phase II subsurface site investigation, as documented in the Phase II Report, was conducted to determine if the three clarifiers on-site from historic commercial uses have resulted in the contamination of soil, soil vapor, or groundwater under the site.

As part of the Phase II Report, five borings were placed throughout the project site adjacent to the on-site clarifiers, and soil, soil vapor, and groundwater samples were collected and analyzed for a variety of chemicals of potential concern. Results of the analyses indicated that total petroleum hydrocarbon (TPH) and volatile organic compound (VOC) concentrations in all soil samples were below USEPA RSLs with the exception of the 0.5-foot bgs sample collected near the clarifier located in the northern-central portion of the site (soil vapor boring [SV] 2 [SV-2]); refer to Exhibit 4.9-1. While the elevated concentrations of TPH C6-C44 (TPH carbon chains) in this sample were slightly above the screening criteria of 300 mg/kg, the Phase II Report concluded that based on field observations and the localized nature of the detection (in one boring and at shallow depth), elevated concentrations of TPH C6-C44 are not considered indicative of a significant release to soil. As such, the Phase II Report determined that no mitigation is required in this regard.



Source: Roux, September 2025

Michael Baker INTERNATIONAL

NOT TO SCALE

09/2025 • JN 208279

FIRST & MOUNTAIN VIEW PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Subsurface Investigation Sampling Locations

Exhibit 4.9-1

Regarding soil vapor, no VOCs were detected above residential DTSC soil vapor screening levels (SVSLs)[1]. However, concentrations of benzene and tetrachloroethylene (PCE) were detected slightly above the conservative residential DTSC SVSLs collected at two locations (near the five-stage clarifier in the northern-central portion of the project site [SV-2] and near the inactive clarifier located in the eastern portion of the on-site commercial structure [SV-4]); refer to Exhibit 4.9-1. Due to multiple lines of evidence, including field observations, the localized nature of the exceedances, and all detections being below residential USEPA SVSLs, the Phase II Report concluded that these elevated concentrations of benzene and PCE are not indicative of a significant release, and no mitigation is required related to soil vapors.

Groundwater sampling results did not indicate that groundwater was affected by current or past activities at the site. Although there was a single estimated detection of benzene in groundwater collected near the clarifier located in the northern-central portion of the site (SV-2) in exceedance of the DTSC SL, the concentration remained below the California's Maximum Contaminant Levels (MCLs) for drinking water. As such, the Phase II Report determined that groundwater has not been adversely affected, and no mitigation is required related to groundwater. Thus, impacts related to former commercial uses on-site would be less than significant in this regard.

Building Demolition Activities

Due to the age of the existing on-site building (constructed prior to 1978), there is the potential for asbestos-containing materials (ACMs) and lead-based paints (LBPs), as well as other potential hazardous materials to be present in association with the on-site building materials. Demolition of these structures could expose construction personnel and the public to ACMs and/or LBPs.

The National Emission Standards for Hazardous Air Pollutants mandates that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition. If ACMs are found, abatement of asbestos would be required prior to any demolition activities. If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste would be required to be evaluated independently from the building material by a qualified environmental professional. If lead-based paint is found, abatement would be required to be completed by a qualified lead specialist prior to any activities that would create lead dust or fume hazard. Upon compliance with existing regulations pertaining to ACMs and LBPs, impacts would be less than significant.

Conclusion

Although results of the subsurface investigations indicate that historical uses of the site have not significantly impacted on-site soil, soil gas, or groundwater and can be developed for residential use, existing clarifiers remain on-site and disturbance of soils, especially in areas near SV-2, could potentially expose construction workers to contaminated soils. As such, the project would be required to implement Mitigation Measure HAZ-1. In accordance with Mitigation Measure HAZ-1, the project applicant would be required to retain a Phase II/Site Characterization Specialist to prepare a Soil Management Plan (SMP) prior to the issuance of any grading permit for the proposed project. The SMP would be made available to the contractor and the City Engineer for use and be communicated to all contractors for use during future earthwork at the site. The SMP would detail appropriate best management practices to properly manage impacted soil in a manner protective of human health and consistent with applicable federal, State, and local laws. Specifically, the SMP shall detail appropriate measures be taken during removal and disposal of the existing clarifiers and associated drains, and during disturbance of soils in the northern portion of the site. With implementation of Mitigation Measure HAZ-1, as well as compliance with existing federal, State, and local laws and regulations, potential risks associated with the potential release of hazardous materials into the environment through reasonably foreseeable upset and

[1] Soil vapor screening levels (SVSLs) were calculated by applying the standard attenuation factor of 0.03 to DTSC SLs and USEPA RSLs for residential indoor air, in accordance with the *Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion* prepared by DTSC and California State Water Resources Control Board dated February 2023.

accident conditions during demolition and/or grading activities would be minimized, and impacts would be reduced to less than significant levels.

Operations

Refer to Response 4.9(a) for a description of long-term operational impacts related to the proposed residential development at the project site. Upon adherence to existing regulations related to hazardous materials, reasonably foreseeable upset and accident impacts during project operations would be less than significant.

Mitigation Measures:

HAZ-1 Soil Management Plan. Prior to issuance of a grading permit, a Soil Management Plan (SMP) shall be prepared by a qualified environmental professional with Phase II/Site Characterization experience (Phase II Specialist). The SMP shall be made available to the contractor and the City of Santa Ana City Engineer for use and be communicated to all contractors for use during future earthwork at the site. The SMP shall detail appropriate best management practices to properly manage impacted soil in a manner protective of human health and consistent with applicable federal, State, and local laws. The SMP shall detail appropriate measures be taken during removal and disposal of the existing clarifiers and associated drains, and during disturbance of soils in the northern portion of the site. Soil generated from the project site that requires off-site disposal shall be characterized prior to disposal at a licensed disposal facility or other commercial property, as appropriate in consultation with the Phase II Specialist.

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

Less Than Significant Impact. The only school within 0.25-mile of the project site is Heritage Elementary School, located at 426 South Andreas Place, approximately 0.23-mile southwest of the site. As discussed in Response 4.9(b), the project would comply with existing regulations for transporting hazardous materials, and implementation of Mitigation Measure HAZ-1 would ensure that soils from the site are properly managed. As stated, upon adherence to existing laws and regulations related to construction activities and operational safety and implementation of Mitigation Measure HAZ-1, impacts pertaining to the potential to emit or handle hazardous materials within one-quarter mile of an existing school would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure HAZ-1.

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

No Impact. Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB) to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

According to the Phase I ESA, the project site is not listed pursuant to Government Code Section 65962.5. Thus, no impact would result in this regard.

Mitigation Measures: 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 nearest airport to the project site is John Wayne Airport, approximately 5.75 miles southeast. According to the *Airport Environs Land Use Plan for John Wayne Airport* (AELUP), the project site is located outside of the Airport Impact Zones, AELUP Notification Area, Federal Aviation Regulation Part 77 Notification Area, and Airport Safety Zones.[2] Therefore, project implementation would not expose people residing or working in the project area to excessive noise levels associated with aircraft. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The most recent version of the *City of Santa Ana Hazard Mitigation Plan* (HMP) was adopted on October 11, 2022. The HMP was prepared in response to the Disaster Mitigation Act of 2000, with the City's first hazard mitigation plan approved by federal Emergency Management Agency (FEMA) on May 10, 2005.

The proposed project would not cause any permanent alterations to vehicular circulation routes or obstruct public access along adjacent roadways that may interfere with an adopted emergency response plan or emergency evacuation plan, including the HMP. As detailed in Response 4.17(d), the portion of South Mountain View Street that bounds the project site to the west terminates in a cul-de-sac to the south, and neighbors an adjacent lot utilized as a City yard. The existing cul-du sac that provides access to the City's Public Works property to the south would reduce in length upon project implementation; refer to Exhibit 2-3. Therefore, temporary off-site construction impacts would result. Nonetheless, given the project location and surrounding land uses, it is not anticipated that temporary lane closures would occur during construction activities such that the project would interfere with an adopted emergency response plan or emergency evacuation plan, including the HMP.

Furthermore, as shown on Exhibit 2-3, the main internal drive aisle would be 20 feet in width to provide fire access consistent with City and Orange County Fire Authority (OCFA) standards. Specifically, the proposed 20-foot wide ingress/egress access point from South Mountain View Street would widen into a 28-foot-wide, two-way turn drive aisle into the site's internal circulation network, where drive aisles range in width from 20 to 33 feet. As depicted in Exhibit 2-3, project circulation would comply with OCFA's design and fire safety standards for turning radii, hammer head turns, and S-curve turns; project plans would be reviewed by OCFA and the City's traffic engineer. As such, project implementation would not result in inadequate emergency access, and a less than significant impact would occur in this regard.

Mitigation Measures: 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 surrounded by urban and developed land and no wildland areas are present in the project vicinity. According to the California Department of Forestry and Fire Protection's *Fire Hazard Severity Zone Viewer*, the project site is not located in or near a State Responsibility Area nor classified as a Very High Fire Hazard Severity Zone.[3] As such, no impact would occur in this regard.

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2 Orange County Airport Land Use Commission, *Airport Environs Land Use Plan for John Wayne Airport*, April 17, 2008.

3 California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer*, https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/, accessed August 25, 2025.

Mitigation Measures: No mitigation measures are required.

4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
3) 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?			✓	
4) 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?			✓	

This section is based primarily on the following technical studies (refer to Appendix E, *Hydrology Study/WQMP*):

- *Preliminary Hydrology and Hydraulics Study for 201 S. Mountain View Street & 4320 W. 1st Street Tentative Tract No. 19391 In the City of Santa Ana, California* (Hydrology Study), prepared by C&V Consulting, Inc., dated June 2025; and

- *City of Santa Ana, County of Orange/Santa Ana Region Priority Project Preliminary Water Quality Management Plan* (WQMP), prepared by C&V Consulting, Inc., dated May 2025;.

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

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The City of Santa Ana is within the jurisdiction of the Santa Ana RWQCB.

Construction

The proposed project may result in water quality impacts during short-term construction activities. The grading required for project implementation would result in exposed soils that may be subject to wind and water erosion. As the proposed residential community would disturb more than one acre of land, the project applicant would be required to obtain a General Construction Permit under the NPDES program, which would further require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) with specific best management practices (BMPs) to be used during construction activities. Implementation of the SWPPP would ensure runoff and discharges during the project's construction phase do not violate any water quality standards. Construction activities would also be required to comply with water quality BMPs in accordance with the project's Water Quality Management Plan (WQMP). For example, project construction would be required to retain eroded sediments and other pollutants on-site; protect stockpiles and other construction-related materials from being transported from the site by wind and/or water; store fuels, oils, solvents, and other toxic materials in accordance with their listing; dispose of trash and construction-related solid wastes in a covered receptable to prevent contamination of rainwater and dispersal by wind; stabilize construction roadways to inhibit sediments from being deposited into the public right-of-way; and stabilize any slopes with disturbed soils to inhibit erosion by wind and/or water, among others. Upon adherence to the SWPPP, WQMP, and existing laws and regulations related to water quality, impacts would be reduced to less than significant levels.

Operations

The project would be regulated under the NPDES Phase I Municipal Stormwater Permits issued by the Santa Ana RWQCB for Orange County (Order No. R8-2009-0030 and NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062).[1] Since 1990, operators of MS4s are required to develop a stormwater management program designed to prevent harmful pollutants from impacting water resources via stormwater runoff. The Orange County Stormwater Program (Stormwater Program) is a cooperative of the County of Orange, Orange County Flood Control District (OCFCD), and all 34 Orange County cities. As the Principal Permittee on the Santa Ana RWQCB NPDES permits, the County guides development and implementation of the Stormwater Program, collaborating regularly with co-permittees to ensure compliance and prevent ocean pollution.

The Stormwater Program's specific water pollutant control elements are documented in the *Drainage Area Management Plan* (DAMP). The DAMP satisfies the NPDES permit conditions to reduce pollutant discharges to the maximum extent practicable for the protection of water quality at receiving water bodies and the support of designated beneficial uses. The DAMP contains guidance on both structural and nonstructural BMPs for meeting these goals. With implementation of the DAMP requirements, as required by Municipal Code Section 18-156, *Control of Urban Runoff*, the project would be required to prepare a WQMP in accordance with the requirements of the NPDES standards.

The applicant has prepared a WQMP, which includes non-structural and structural source control BMPs; refer to Appendix E. The project's non-structural BMPs include education materials for property owners, tenants, and occupants; activity restrictions; common area landscape management; BMP maintenance; spill contingency plan; Uniform Fire Code implementation; common area litter control; common area catch basin inspection; and street sweeping private streets and parking lots. Structural source control BMPs include providing storm drain system stenciling and signage; designing and constructing trash and waste storage areas to reduce pollution introduction; and using efficient irrigation systems and landscaping design, water conservation, smart controllers, and source control.

The proposed project would also install catch basins to convey surface stormwater runoff into a modular wetland biofiltration vault system to be treated. Once the water is treated, it would be conveyed through an underground storm

[1] California Regional Water Quality Control Board Santa Ana Region, *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County*, May 22, 2009, https://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2009/09_030_OC_MS4_as_amended_by_10_062.pdf, accessed September 18, 2025.

drain system to a proposed stormwater sump pump. The sump pump would discharge runoff through a proposed parkway drain into the public right-of-way of South Mountain View Street. Runoff that exceeds the water quality treatment flow rate would be conveyed through the underground storm drain system to the stormwater sump pump and into the public right-of-way of South Mountain View Street, and follow historic drainage patterns. Based on the results of the Hydrology Study, the proposed conditions would generate less site runoff compared to existing conditions. As such, following compliance with the requirements of the MS4 permit, the DAMP, and the WQMP, project implementation would not violate any water quality standards or waste discharge requirements associated with long-term operations. Impacts in this regard would be less than significant.

Mitigation Measures: 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 project would increase impervious surfaces at the project site by 6.5 percent compared to existing conditions; however, implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge as the site is not currently used for groundwater extraction or groundwater recharge purposes. Further, as analyzed in Section 4.19, *Utilities and Service Systems*, while the City's water supply is reliant on groundwater, existing capacity is available to serve the proposed project's water demands from existing supplies and facilities. Accordingly, project implementation is not expected to impede sustainable groundwater management of the basin. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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:

1) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Soil disturbance would temporarily occur during project construction due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, and grading. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project site. The project would be subject to compliance with the BMPs identified in the project's SWPPP and WQMP; refer to Response 4.10(a). Compliance with these plans and existing regulations would reduce the volume of sediment-laden runoff discharging from the site. Therefore, project implementation would not result in a substantial increase in erosion or siltation on- or off-site during construction.

Currently, stormwater generally surface flows west to South Mountain View Street and then north into West First Street. At project completion, on-site runoff would drain to an underground treatment and conveyance system, and then follow historic drainage patterns within the roadway right-of-way. Given the nature of residential uses and the urbanized project area, long-term project operations would not have the potential to result in substantial erosion or siltation off-site. The project would not include large areas of exposed soils that would be subject to runoff; rather, any unpaved areas (i.e., the central open space/picnic area) would be planted with a mix of trees, groundcover, and shrubs to minimize the potential for erosion/siltation; refer to Exhibit 2-6, *Conceptual Landscape Plan*. In addition, as stated within Response 4.10(a), the project would also be subject to existing requirements of the NPDES permit, DAMP, and WQMP. Thus, long-term impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) 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 is generally flat and is located within an urbanized area. As described above, stormwater currently surface flows west to South Mountain View Street and then north into West First Street. At project completion, on-site runoff would drain to an underground treatment and conveyance system, and then follow historic drainage patterns within the roadway right-of-way. Specifically, proposed catch basins would convey surface stormwater runoff into a modular wetland biofiltration vault system to be treated. Once the water is treated, it would be conveyed through an underground storm drain system to a proposed stormwater sump pump. The sump pump would discharge runoff through a proposed parkway drain into the public right-of-way of South Mountain View Street. Runoff that exceeds the water quality treatment flow rate would be conveyed through the underground storm drain system to the stormwater sump pump and into the public right-of-way of South Mountain View Street, and follow historic drainage patterns. Based on the results of the Hydrology Study, the proposed conditions would decrease flow rates on site and generate less site runoff compared to existing conditions. Thus, on-site stormwater flow would be adequately accommodated by existing and proposed storm drain facilities, and impacts pertaining to flooding conditions on- and off-site would be less than significant.

Mitigation Measures: No mitigation measures are required.

3) 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 noted in Response 4.10(c)(1), although project implementation would result in a 6.5 percent increase in impervious areas, the proposed stormwater treatment and conveyance system would decrease flow rates on-site and generate less site runoff compared to existing conditions. Therefore, the proposed project is not anticipated to exceed the capacity of the existing or planned stormwater drainage systems. Additionally, as indicated in Response 4.10(a), less than significant impacts related to potential polluted runoff from the site would occur upon compliance with the MS4 permit, DAMP, and WQMP. As a result, project implementation is not anticipated to 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. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

4) Impede or redirect flood flows?

Less Than Significant Impact. Refer to Response 4.10(c)(2).

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact.

Flood Hazard

According to the Hydrology Study, the project site is mapped in Flood Insurance Rate Map (FIRM) No. 06059C0256J, revised December 3, 2009, and located within Zone A, which is an area with a one percent annual chance of flood (i.e. a 100-year flood zone). However, potential inundation on the project site would not risk the release of pollutants. As stated above, the project proposes to install on-site catch basins, a modular wetland biofiltration treatment system, and a stormwater sump pump. The proposed conditions are anticipated to decrease flow rates on-site and generate less site runoff compared to existing conditions. Additionally, as stated in Response 4.10(a), the project would be subject to existing water quality related requirements of the NPDES permit, DAMP, and WQMP. Further, per the *Orange*

County Hydrology Manual and as detailed in the Hydrology Study, all habitable structures would be required to have finished floor elevation to allow a minimum one-foot freeboard during the 100-year storm event – this would apply to all proposed structures on-site. Thus, impacts in this regard would be less than significant.

Tsunami

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is located over eight miles inland from the Pacific Ocean and is located at a sufficient distance so as not to be subject to tsunami impacts. No impact would occur in this regard.

Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The project site is adjacent to a City of Santa Ana Public Works Department enclosed water reservoir to the south. However, the *Santa Ana General Plan Update Draft Environmental Impact Report* does not recognize this reservoir as one of the City's inland bodies of water capable of creating a seiche.[2] Impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The *Santa Ana River Basin Water Quality Control Plan* (Basin Plan) establishes water quality standards for ground and surface waters within the Santa Ana River Basin, which includes the City, and is the basis for the Santa Ana RWQCB's regulatory programs. The City is located within the Coastal Plan of Orange County groundwater basin, which is designated as a medium-priority basin and regulated by the Orange County Water District (OCWD).[3]

As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit would ensure that project impacts related degradation of water quality would be less than significant. Also, as described previously, the project would implement a WQMP during long-term operations that would comply with the Orange County DAMP. Further, and as detailed in Section 4.19, the City's supply of water, including groundwater, would be sufficient during both normal years and multiple dry year conditions to meet all of the City's estimated needs, including the proposed project. Accordingly, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[2] City of Santa Ana, *Santa Ana General Plan Update Draft Environmental Impact Report, State Clearinghouse #2020029087*, August 2020.

[3] California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/final/, accessed September 18, 2025.

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4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any 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. Factors that could physically divide a community include, but are not limited to:

- Construction of major highways or roadways;
- Construction of storm channels;
- Closing bridges or roadways; and
- Construction of utility transmission lines.

The key factor with respect to this question is creating physical barriers that change the connectivity between areas of a community to the extent that people are separated from other areas of the community. The proposed project would not physically divide an established community. As indicated in Section 2.0, *Project Description*, the project site is completely developed and disturbed and is vacant with no existing operations. Surrounding land uses include a mixture of residential and commercial uses. Specifically, existing single- and multi-family residential uses are located to the north across West First Street, and an existing multi-family residential community (Parkside Court Apartments) is located to the east.

Rather than physically divide the existing residential community adjacent to the site, development of the proposed 61-unit townhomes community with common open space would contribute to a more established community than a vacant lot. The proposed townhome development would be consistent with surrounding residential and commercial uses and would not create any physical barrier that divides any established community. Thus, no impact would occur in this regard.

Mitigation Measures: 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 Consistency

Based on the General Plan Land Use Map, the project site is designated General Commercial (GC) and Low-Medium Density Residential (LMR-11). The GC designation provides for highly visible and accessible shopping opportunities along arterial corridors and supports the development and continued operation of recreational, cultural, entertainment, employment, and educational opportunities near established residential neighborhoods. According to the General Plan Land Use Element, the maximum density/intensity allowable for the GC land use designation is 0.5 floor area ratio (FAR). The LMR-11 designation applies to residential areas suitable for multiple building types, including single-family

detached homes, small-lot subdivisions, townhomes, duplexes, and mobile home parks; it has a maximum density of 11 dwellings per acre and a typical maximum height of three stories.

The project proposes to develop a 61-unit residential community with nine separate three-story townhome buildings. As currently proposed, the project would be consistent with the maximum height (three stories) allowed under the GC and LMR-11 designation; however, 61 townhome units on a 2.54-acre site would result in a density of approximately 24 dwelling units per acre, which exceeds the allowable density under the site's existing LMR-11 land use designation. As such, the project proposes a General Plan Amendment to change the site's land use designations from GC and LMR-11 to Urban Neighborhood-Low (UN-20). The UN-20 designation would allow a maximum of 20 dwelling units per acre, 1.0 FAR, and a (similar) maximum building height of three stories. Upon approval of the proposed General Plan Amendment, the project site's maximum base density under the new designation would be 50 dwelling units. The project would support the General Plan by promoting housing near transit and converting commercial/industrial zoning into residential use (with low-income units) that supports the City's long-term housing goals.

Additionally, the project is requesting a California Government Code Section 65915 et seq. density bonus. As stated, the proposed UN-20 land use designation would allow a maximum base density of 50 units on the 2.54-net acre site. The project includes five percent Very Low Income units (three total units), and therefore, would be entitled to a 20 percent bonus density under the State Density Bonus Law, for a total of 61 units proposed on the 2.54-net acre site. The proposed density bonus complies with the City's Housing Opportunity Ordinance (Municipal Code Section 41-1902(c)).

Table 4.11-1, *General Plan Land Use Consistency Analysis*, analyzes the project's consistency with relevant General Plan Land Use Element goals and policies relevant to the anticipated land use type (i.e., multi-family residential). As demonstrated in Table 4.11-1, the project is consistent with the General Plan Land Use Element.

Table 4.11-1
General Plan Land Use Consistency Analysis

Relevant Policies	Project Consistency Analysis
GOAL LU-1: Growing Responsibly *Provide a land use plan that improves quality of life and respect our existing community.*	
Policy LU-1.1 Compatible Uses. Foster compatibility between land uses to enhance livability and promote healthy lifestyles.	Consistent. The project site is located within a highly developed and urbanized area of Santa Ana surrounded by single- and multi-family residential uses. The project would redevelop the vacant site into a 61-unit townhome community, including three live/work units to enhance livability and promote healthy lifestyles. As such, the project would be consistent with this policy.
Policy LU-1.2 Homeownership Opportunities. Support innovative development policies to expand homeownership opportunities at all income levels.	Consistent. The project proposes to develop a residential community consisting of 61 for-sale townhome units, and five percent of the 61 proposed units (three units) would be designated as Very Low-Income units. As such, the project would support innovative development policies to expand homeownership opportunities at all income levels.
Policy LU-1.3 Equitable Creation And Distribution of Open Space. Promote the creation of new open space and community-serving amenities in park-deficient areas that keeps pace with the increase in multi-unit housing development, with priority given to those that are also within environmental justice area boundaries.	Consistent. With four City parks located within one mile of the project site, the project is not located within a park deficient area as identified on the City's Park Master Plan Map 4-1, *Park Access (Service Areas and Gaps)*. The project proposes public and private open space areas as part of the residential development. Common open space totaling 10,876 square feet is proposed in various locations within the site; refer to Exhibit 2-3, *Conceptual Site Plan*, and 2-6, *Conceptual Landscape Plan*. Specifically, an approximately 3,710-square foot central open space/picnic area is proposed with amenities, including a pedestal barbecue and hot coal grill, picnic table, trash and recycling receptacles, a pedestrian bench, and bike racks. Additionally, an approximately 635-square foot elevated corner

Relevant Policies	Project Consistency Analysis
	plaza with enhanced paving and raised planter boxes is proposed in the northwest corner of the site adjacent to the proposed three live/work units. Furthermore, a 5,266-square foot open space with a meandering walkway with benches would be constructed along the southern project boundary to provide pedestrian access to each building. The main driveway would also be improved with open space on each side. Approximately 101 square feet of private open space (second-story deck or patio) would also be provided for each townhome unit. Additionally, each unit would include private storage space. Across the project site, the total landscaped area would be approximately 14,835 square feet. Overall, the proposed multi-unit housing development is designed to develop new open space and community-serving amenities and would be consistent with this policy.
Policy LU-1.5 Diverse Housing Types. Incentivize quality infill residential development that provides a diversity of housing types and accommodates all income levels and age groups.	Consistent. The project site is located within a highly developed and urbanized area of Santa Ana surrounded by single- and multi-family residential uses. The site is completely developed and disturbed and is vacant with no existing operations. The project would redevelop the vacant site into a 61-unit townhome community, and five percent of the 61 proposed units (three units) would be designated as Very Low-Income units. As such, the project would be consistent with this policy.
Policy LU-1.6 Transit Oriented Development. Encourage residential mixed-use development, within the City's District Centers, Urban Neighborhoods, and adjacent to high quality transit.	Consistent. The proposed project is located within a half-mile buffer of a high-quality bus stop as shown in the *Santa Ana Transit Priority Areas Map*; refer to Exhibit 6, *Santa Ana Transit Priority Areas* in Appendix G, *VMT Analysis*. Further, the project proposes 61 for-sale townhomes community with three live/work units. As such, the project would be consistent with this policy.
Policy LU-1.7 Active Transportation Infrastructure. Invest in active transportation connectivity between activity centers and residential neighborhoods to encourage healthy lifestyles.	Consistent. Refer to response to Policy LU-1.6.
Policy LU-1.8 Development Tradeoffs. Ensure that new development projects provide a net community benefit.	Consistent. By providing 61 for-sale units with a portion of the units designated as Very Low-Income units and three live/work units, the project would support the General Plan and the City's long-term housing goals by placing higher density housing near transit and converting commercial/industrial zone sites into residential use. As such, the project would be consistent with this policy.
Policy LU-1.9 Public Facilities And Infrastructure. Evaluate individual new development proposals to determine if the proposals are consistent with the General Plan and to ensure that they do not compound existing public facility and service deficiencies.	Consistent. As detailed in this section and in Section 4.15, *Public Services*, and Section 4.19, *Utilities and Service Systems*, the project would be consistent with the General Plan and would not result in significant impacts to public facilities nor create service deficiencies. As such, the project would be consistent with this policy.
GOAL LU-2: Land Use Needs *Provide a balance of land uses that meet Santa Ana's diverse needs.*	
Policy LU-2.5 Benefits of Mixed-Use. Encourage infill mixed-use development at all ranges of affordability to reduce vehicle miles traveled, improve jobs/housing balance, and promote social interaction.	Consistent. Although not considered a mixed-use project, three of the 61 townhome units are designed as live/work units; refer to Table 2-1, *Proposed Townhome Units*. Additionally, the project site is located in a transit priority area and thus, contributes towards reducing vehicle miles traveled by providing housing near transit areas. As such, the project would be consistent with this policy.
Policy LU-2.9 Open Space Needs. Establish and maintain public open space and recreation	Consistent. Refer to response to Policy LU-1.3

Relevant Policies	Project Consistency Analysis
requirements for new residential and nonresidential uses to provide sufficient open space and recreational opportunities for Santa Ana residents and visitors.	
Policy LU-2.10 Smart Growth. Focus high density residential in mixed-use villages, designated planning focus areas, Downtown Santa Ana, and along major travel corridors.	Consistent. Although not considered a mixed-use project, the project would convert a commercial/industrial zone site into residential use, and the proposed General Plan Amendment (changing the site's land use designations from GC and LMR-11 to UN-20) would allow a higher density development (maximum of 20 dwelling units per acre instead of 11 units per acre) to occur on the site. As such, the project would support the General Plan and the City's long-term housing goals by placing housing near transit and converting commercial/industrial zoning into residential use (with low-income units). As such, the project would be consistent with this policy.
GOAL LU-3: Compatibility of Uses *Preserve and improve the character and integrity of existing neighborhoods and districts.*	
Policy LU-3.1 Community Benefits. Support new development which provides a net community benefit and contributes to neighborhood character and identity.	Consistent. The project site is currently vacant. The proposed townhome community would be designed in a contemporary Spanish style and complement existing residences in the project area. The proposed development would enhance the visual character and identity of the existing vacant lot and contribute towards a more established residential community with the surrounding single- and multi-family residences.
Policy LU-3.4 Compatible Development. Ensure that the scale and massing of new development is compatible and harmonious with the surrounding built environment.	Consistent. The proposed townhome community would have a maximum building height of three stories, consistent with existing residences in the project area. Specifically, a number of small multi-family developments are located near the project site, including a three-story multi-family community to the east and a two-story multi-family community to the north. Further, among the nine buildings proposed, six different types of building configurations are proposed; refer to Exhibit 2-4, Conceptual Building Section, and Exhibits 2-5a, *Building Elevations – C-100*, through 2-5f, *Building Elevations – C-600*. As shown, the proposed townhomes would be designed in a contemporary Spanish style. Building materials would include painted stucco, bay windows, metal railings, and stone veneers, among others, and building exteriors would be painted in a variety of neutral/warm tones (white stucco walls, red roof tiles, brown beams, blue and plum colored doors, and Spanish tiles). The proposed building materials, colors, and architectural features would be harmonious and complementary to existing development in the project area. As such, the project would be consistent with this policy.
Policy LU-3.7 Attractive Environment. Promote a clean, safe, and creative environment for Santa Ana's residents, workers, and visitors.	Consistent. Refer to Policy LU-3.4.
Policy LU-3.8 Sensitive Receptors. Avoid the development of industry and sensitive receptors in close proximity to each other that could pose a hazard to human health and safety due to the quantity, concentration, or physical or chemical characteristics of the hazardous materials utilized, or the hazardous waste an operation may generate or emit.	Consistent. Section 4.3, *Air Quality*, concludes that the proposed residential development would not generate adverse odorous emissions or obnoxious fumes during construction or operational activities. Additionally, as analyzed in Section 4.9, *Hazards and Hazardous Materials*, hazardous materials are not typically associated with residential uses. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for adverse impacts to occur. Overall, the project would not pose a hazard to human health and safety and would be consistent with this policy.

Relevant Policies	Project Consistency Analysis
Policy LU-3.9 Noxious, Hazardous, Dangerous, And Polluting Uses. Improve the health of residents, students, and workers by limiting the impacts of construction activities and operation of noxious, hazardous, dangerous, and polluting uses that are in close proximity to sensitive receptors, with priority given to discontinuing such uses within environmental justice area boundaries.	Consistent. Refer to response to Policy LU-3.8.
GOAL LU-4: Complete Communities *Support a sustainable Santa Ana through improvements to the built environment and a culture of collaboration.*	
Policy LU-4.1 Complementary Uses. Promote complete neighborhoods by encouraging a mix of complementary uses, community services, and people places within a walkable area.	Consistent. Refer to response to Policy LU-1.3.
Policy LU-4.3 Sustainable Land Use Strategies. Encourage land uses and strategies that reduce energy and water consumption, waste and noise generation, soil contamination, air quality impacts, and light pollution.	Consistent. As discussed in Section 4.6, *Energy*, the project would be required to comply with the most current Title 24 and CALGreen standards that promote energy efficiency. As analyzed in Section 4.19, *Utilities and Service Systems*, project development would not exceed existing capacities associated with water, dry utility, and solid waste facilities. As concluded in Section 4.13, *Noise*, the proposed 61-unit residential development would not result in significant construction-related or operational noise impacts. Last, as analyzed in Section 4.1, *Aesthetics*, the project would not result in significant light and glare impacts to nearby sensitive receptors. Refer to response to Policy LU-3.8 regarding soil contamination and air quality impacts. Overall, the project would incorporate sustainable land use strategies that reduce energy and water consumption, waste and noise generation, soil contamination, air quality impacts, and light pollution, and would be consistent with this policy.
Policy LU-4.5 VMT Reduction. Concentrate development along high quality transit corridors to reduce vehicle miles traveled (VMT) and transportation-related carbon emissions.	Consistent. Refer to response to Policy LU-1.6. As detailed in Section 4.17, *Transportation*, the project is screened out from additional VMT analysis and is presumed to result in less than significant impacts pertaining to VMT given its location in a transit priority area. Further, as detailed in Section 4.8, *Greenhouse Gas Emissions*, GHG emissions from project-related mobile sources would not conflict with applicable GHG reduction measures and would not result in a significant impact. Overall, the project is consistent with this policy.
Policy LU-4.6. Healthy Living Conditions. Support diverse and innovative housing types that improve living conditions and promote a healthy environment.	Consistent. The project proposes to develop a residential community consisting of 61 for-sale townhome units with approximately 10,876 square feet of common open space and 136 parking spaces. The residential community would consist of nine separate three-story townhouse buildings (four-plex to ten-plex) totaling approximately 101,842 square feet in living area (excluding garages and open spaces). Among these 61 units, three are designed as live/work units. Five percent of the 61 proposed units (three units) would be designated as Very Low-Income units. Overall, the project consists of diverse and innovative housing that improve living conditions and promote a healthy environment. As such, the project would be consistent with this policy.
Policy LU-4.7 Diverse Communities. Promote mixed-income developments with mixed housing types to create inclusive communities and economically diverse neighborhoods.	Consistent. Refer to response to Policy LU-4.6. Additionally, five percent of the 61 proposed units (three units) would be designated as Very Low-Income units. As such, the project would be consistent with this policy.

Relevant Policies	Project Consistency Analysis
Policy LU-4.8 Community Partnerships. Collaborate with property owners, community organizations, and other local stakeholders to identify opportunities for additional open space and community services, such as community gardens and gathering places.	Consistent. Refer to response to Policies LU-1.3 and LU-2.9.

Source: City of Santa Ana, *Santa Ana General Plan Land Use Element*, April 2022.

Zoning Code Consistency

Based on the *City of Santa Ana Zoning Map* (Zoning Map), the site is zoned General Commercial (C2) and Light Industrial (M1). The C2 district allows for a wide variety of businesses and uses but also includes specific regulations for development and operation. The M1 zone primarily accommodates light industrial uses including fabrication, manufacturing, assembly, or processing of already processed materials as well as industry-supporting activities.

The project proposes a Zone Change to change the site's zoning from C2 and M1 to Specific Development (SD). The SD zone accommodates a specific development plan for a project site in accordance with an approved development plan and specific development standards. Specifically, the proposed SD zone is designed to complement the Harbor Mixed Use Transit Corridor Specific Plan (Specific Plan) given that the site is approximately 0.25-mile to the west of the Specific Plan area. The proposed project would support the Specific Plan by providing higher density housing near transit and converting commercial/industrial zone sites into residential uses that support the City's long-term housing goals, including providing low-income units.

The Specific Plan identifies four land use districts: Transit Node, Corridor, Neighborhood Transitional, and Open Space. Each district has its own development standards and preferred building and frontage types. The Neighborhood Transitional district provides standards for development that acts as a transition between the single-family neighborhoods to the north and south of First and Fifth Streets and the Corridor and Transit Node districts. Designated for the lowest scale and the lowest intensity of uses in the Specific Plan, development in this district is limited to residential, live-work, or neighborhood-serving commercial uses. These uses may combine commercial on the ground floor with residential above or in freestanding single-use buildings on the same site at between two and three stories in height. Accordingly, as the project site is located south of First Street, the project site would be designed to meet Neighborhood Transitional district standards.

Development standards of the Specific Plan Neighborhood Transitional land use district are utilized for this analysis. Table 4.11-2, *Neighborhood Transitional Development Standards Consistency Analysis*, details the project's consistency with applicable development standards. As shown, the project would be consistent with applicable development standards.

Table 4.11-2
Neighborhood Transitional Development Standards Consistency Analysis

Development Standard	Requirement[1]	Proposed Project	Does Project Satisfy Requirement?
Building Type and Form			
Building Height	Live-Work: 2 - 3 stories Tuck-Under: 2 - 3 stories	3 stories	Yes
Building Frontage Types and Floor Heights			
Permitted Frontage Type	Stoop (E); Front Yard/Porch (F)	Stoop (E) Type	Yes
Frontage Floor Height Minimum	Stoop (E): 10 feet ground floor, 9 feet upper floor; Front Yard/Porch (F): 10 feet ground floor, 9 feet upper floor	10 feet and 1 inch on ground floor and 9 feet and 1 inch on upper floors	Yes
Building Placement (Setbacks)			
Adjacent to Public Right-of-Way	8 feet maximum	5 to 8 feet	Yes
Adjacent to Alley or Internal Drive Aisle	3 feet minimum	5 to 15 feet	Yes
Adjacent to Parking	7 feet minimum	At least 7 feet	Yes
Clear Zone	25 feet minimum	An approximately 635-square foot (27 feet by 29 feet) elevated corner plaza with enhanced paving and raised planter boxes is proposed in the northwest corner of the site adjacent to the proposed live/work units. This area would be considered the clear zone.	Yes
Setback Adjacent to Other Uses	5 feet minimum	5 to 25 feet	Yes
Building to Building	6 feet minimum (up to third floor)	15 to 33 feet	Yes
Open Space Requirements			
Public Open Space	15 percent of site minimum (with a minimum of 15 feet in each direction)	Approximately 9.8 percent of the net site area (10,876 square feet)	Yes, upon approval of Zone Change and requested Density Bonus Waiver
Minimum Private Open Space	90 square feet per unit minimum (with a minimum of 7 feet in each direction)	101 square feet per unit (as second-story deck or patio)	Yes
Off Street Parking/Bicycle Parking Standards			
Parking Spaces	Neighborhood Transitional: 2.25 space per unit State Density Bonus Parking Requirements: 2-bedroom: 1.5 spaces per unit; 3-bedroom: 1.5 spaces per unit; and,	Based on the State density bonus parking standards, the project is required to provide 121.5 spaces. The project proposes 136 spaces (122 covered residential spaces and 14 open/guest spaces).	Yes

Development Standard	Requirement[1]	Proposed Project	Does Project Satisfy Requirement?
	4-bedroom: 2.5 spaces per unit.		
Stall Requirements	One Car Garage: 12 feet wide and 20 feet long minimum Two Car Garage: 10 feet wide and 20 feet long minimum	The project provides two-car garages for each unit, and each garage would be 10 feet wide by 20 feet long.	Yes
Bicycle	1 space per 5 units, but not less than 4 spaces (A total of 12 spaces required)	The project is required to provide 12 bicycle parking spaces. The project proposes 12 bicycle parking spaces within two bicycle racks.	Yes
Landscaping			
Front Yard (for parcels fronting First and Fifth Streets)	Housing may maintain a shallow-depth landscaped front yard separating buildings from sidewalks.	Landscaped front yards proposed throughout.	Yes
Setbacks, yards, and shared common open spaces	In-ground or above-ground plantings, enhanced hardscape, or outdoor seating or dining areas.	Central open space/picnic area is proposed with amenities, including a pedestal barbecue and hot coal grill, picnic table, trash and recycling receptacles, a pedestrian bench, and bike racks.	Yes
Buffer	A landscape buffer of not less than 5 feet shall be provided to separate any parking lot from an adjacent property, unless the parking lot provides shared access.	A landscaped buffer ranging from 5 to 25 feet in width would be provided along the site perimeters.	Yes
Other Standards			
Minimum Storage Space	250 cubic feet per unit, with minimum dimensions of 4 feet by 8 feet	250 cubic feet per unit	Yes

Source: City of Santa Ana, *Harbor Mixed Use Transit Corridor Plan, Chapter 3 Land Use Plan and Development Standards*, October 2014.

The project would require the following discretionary approvals from the City:

- *General Plan Amendment*. A General Plan Amendment would be required to redesignate the site from GC and LMR-11 to UN-20 to allow the proposed maximum base density of 20 dwelling units per acre.

- *Zone Change*. The project proposes a Zone Change to change the site's zoning from C2 and M1 to SD. The SD zone accommodates a specific development plan for a project site in accordance with an approved development plan and specific development standards. The proposed SD zone is designed to be consistent with the Harbor Mixed Use Transit Corridor Specific Plan Neighborhood Transitional land use district development standards given the proximity to the Specific Plan area (approximately 0.25-mile to the east of the project site).

- *Tentative Tract Map*. A Tentative Tract Map would be required to subdivide the property for the sale of each townhome unit.

- *Density Bonus*. The project includes a California Government Code Section 65915 et seq. density bonus request. The proposed UN-20 land use designation would allow a maximum base density of 50 units on the 2.54-net acre site. The project includes five percent Very Low Income units (3 total units), and therefore, would be entitled to a 20 percent bonus density under the State Density Bonus Law, for a total of 61 units. The proposed density bonus complies with the City's Housing Opportunity Ordinance (Municipal Code Section 41-1902(c)). The three Very Low Income units would be deed restricted.

- *Density Bonus Waiver*. The project proposes a Density Bonus waiver from the minimum common open space requirement (15 percent required, approximately 9.8 percent, or 10,876 square feet proposed). This waiver allows the project to be developed with increased density (additional units) that would otherwise be physically infeasible.

Based on the analysis above and upon approval of the requested entitlements, the proposed project would not conflict with applicable goals and policies in the General Plan or applicable regulations under the Zoning Code. As such, the project would result in less than significant impacts in this regard.

Mitigation Measures: No mitigation measures are required.

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4.12 MINERAL RESOURCES

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

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

No Impact. According to the General Plan Land Use Element, there are no significant mineral aggregate resource areas designated within the City.[1] Further, there are no current mineral extraction activities on the project site or within Santa Ana. Thus, no impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Refer to Response 4.12(a).

Mitigation Measures: No mitigation measures are required.

[1] City of Santa Ana, *Santa Ana Final General Plan, Land Use Element*, April 2022.

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4.13 NOISE

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

Noise Definition

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA.

Groundborne Vibration

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

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. PPV is typically used for evaluating potential building damage, whereas PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration. Typically, ground-borne vibration, generated by man-made activities, attenuates rapidly with distance from the source of vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 500 feet or less) from the source. Both construction and operation of development projects can generate ground-borne vibration.

Table 4.13-1, *Human Reaction and Damage to Buildings from Continuous Vibration Levels*, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in Table 4.13-1 should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where groundborne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Table 4.13-1
Human Reaction and Damage to Buildings from Continuous Vibration Levels

Peak Particle Velocity (inch/second)	Human Reaction	Effect on Buildings
0.006-0.019	Range of threshold of perception	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level to which ruins and ancient monuments should be subjected
0.1	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities	Virtually no risk of architectural damage to normal buildings
0.2	Vibrations may begin to annoy people in buildings	Threshold at which there is a risk of architectural damage to normal dwellings[1]
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Architectural damage and possibly minor structural damage

Notes:
1. Historic and some old buildings have a threshold of inch-per-second 0.25 PPV.

Source: California Department of Transportation, *Transportation and Construction Vibration Guidance Manual, Tables 5 and 12*, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf., April 2020.

Regulatory Framework

State

State Office of Planning and Research Noise Element Guidelines

The State Office of Planning and Research (OPR) Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The OPR Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various

land uses with a range of environmental noise levels in terms of the Community Noise Equivalent Level (CNEL). Table 4.13-2, *Land Use Compatibility for Community Noise Environments*, presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

Table 4.13-2
Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial, Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

Notes: NA = Not Applicable; L_{dn} = Day/Night Average; CNEL = community noise equivalent level; dBA = A-weighted decibels

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable – New construction or development should generally not be undertaken.

Source: State of California Governor's Office of Planning and Research, *General Plan Guidelines*, July 2017.

Caltrans Transportation and Construction Vibration Guidance Manual

The *Transportation and Construction Vibration Guidance Manual* prepared by the California Department of Transportation (Caltrans) identifies various vibration damage criteria for different building classes. As the nearest structures to project construction are residences, the architectural damage criterion for continuous vibrations at older residential structures of 0.3 inch-per-second PPV is utilized.[1]

Assembly Bill 1307 and Public Resources Code Section 21085

On September 7, 2023, Assembly Bill 1307, CEQA: Noise Impact: Residential Projects, was filed with the Secretary of State to add Section 21085 to the Public Resources Code, which states "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment." This

[1] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, Table 19, September 2013.

bill was effective immediately to address the current substantial housing crisis and to ensure housing projects are not subject to further uncertainty, delay, or risk of lawsuit.

Local

City of Santa Ana General Plan

The General Plan Noise Element helps the City minimize noise problems in areas sensitive to noise due to development. The Noise Element focuses on remedial measures to deal with existing noise problems, the prevention of new noise problems through proper arrangement of noise sensitive land uses in relationship to circulation systems, and establishment of appropriate noise emission or insulation standards for the various land uses. Table 4.13-3, *City Noise Standards – Interior and Exterior*, shows the City's adopted noise standards and guidelines.

Table 4.13-3
City Noise Standards – Interior and Exterior

Categories	Land Use Categories	Interior[1]	Exterior[2]
Residential	Single-Family, duplex, multi-family	45[3]	65
Institutional	Hospital, school classroom/playgrounds	45	65
	Church, library	45	--
Open Space	Parks	--	65

Notes:
1. Interior areas include, but are not limited to, bedrooms, bathrooms, kitchens, living rooms, dining rooms, closets, corridors/hallways, private offices, and conference rooms.
2. Exterior areas include private yards of single-family homes, park picnic areas, school playgrounds, and common areas; private open space (e.g., atriums or balconies) shall be excluded form exterior areas provided sufficient common area is included within the project.
3. Interior noise level requirements assume a closed-window condition. Mechanical ventilation system or other means of natural ventilation shall be provided per Chapter 12 of the Uniform Building Code, as necessary

Source: City of Santa Ana, *City of Santa Ana General Plan Noise Element,* adopted April 2022.

The Noise Element includes the following goals and policies that are applicable to the proposed project.

GOAL N-1 LAND USE COMPATIBILITY: Ensure that existing and future land uses are compatible with current and projected local and regional noise conditions.

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

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

GOAL N-2 NOISE GENERATORS: Reduce the impact of known sources of noise and vibration.

Policy N-2.1 Transportation Related Noise: Reduce noise generated from traffic, railroads, transit, and airports to the extent feasible.

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

Santa Ana Municipal Code

Chapter 18 Article VI of the Municipal Code contains the City's noise control regulations. The following sections of the Municipal Code are applicable to the proposed project.

Section 18-311. – Designated Noise Zone.

The entire City of Santa Ana is hereby designated as "Noise Zone 1."

Section 18-312. – Exterior Noise Standards.

(a) *The following noise standards, unless otherwise specifically indicated, shall apply to all residential property within a designated noise zone* (refer to Table 4.13-4, *City Exterior Noise Standards*)*:*

Table 4.13-4
City Exterior Noise Standards

Noise Zone	Noise Level	Time Period
1	55 dB(A)	7:00 a.m. – 10:00 p.m.
	50 dB(A)	10:00 p.m. – 7:00 a.m.

Notes: dB(A)= A-weighted decibels

1. In the event the alleged offensive noise consists entirely of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by five (5) dB (A).

(b) *It shall be unlawful for any person at any location within the City of Santa Ana to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, when the foregoing causes the noise level, when measured on any other residential property, to exceed:*

1. *The noise standard for a cumulative period of more than thirty (30) minutes in any hour; or*
2. *The noise standard plus five (5) dBA(A) for a cumulative period of more than fifteen (15) minutes in any hour: or*
3. *The noise standard plus ten (10) dB(A) for a cumulative period of more than five (5) minutes in any hour; or*
4. *The noise standard plus fifteen (15) dB(A) for a cumulative period of more than one minute in any hour; or*
5. *The noise standard plus twenty (20) dB(A) for any period of time.*

(c) *In the event the ambient noise level exceeds any of the first four (4) noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.*

Section 18-313. – Interior Noise Standards.

(a) *The following noise standards, unless otherwise specifically indicated, shall apply to all residential property within a designated noise zone* (refer to Table 4.13-5, *City Interior Noise Standards*)*:*

Table 4.13-5
City Interior Noise Standards

Noise Zone	Noise Level	Time Period
1	55 dB(A)	7:00 a.m. – 10:00 p.m.
	45 dB(A)	10:00 p.m. – 7:00 a.m.

Notes: dB(A)= A-weighted decibels

1. In the event the alleged offensive noise consists entirely of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by five (5) dB (A).

(b) It shall be unlawful for any person at any location within the City of Santa Ana to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, when the foregoing causes the noise level, when measured within any other dwelling unit on any residential property, to exceed:

1. The interior noise standard for a cumulative period of more than five (5) minutes in any hour; or

2. The interior noise standard plus five (5) dB(A) for a cumulative period of more than one minute in any hour; or

3. The interior noise standard plus ten (10) dB(A) for any period of time.

(c) In the event the ambient noise level exceeds either of the first two (2) noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the third noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

Section 18-314. – Special Provisions.

The following activities shall be exempted from the provisions of this article:

(e) Noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or any time on Sunday or a federal holiday.

Existing Conditions

Stationary Sources

The project area is located within an urbanized area. The primary sources of stationary noise in the project vicinity are urban-related activities (i.e., mechanical equipment, commercial areas, parking areas, and pedestrians). The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Mobile Sources

The majority of the existing noise in the project area is generated from vehicles traveling along West First Street. According to the General Plan, the 65 dBA CNEL traffic noise contour along West First Street is within 50 to 100 feet of the right-of way.[2,3]

Noise Measurements

In order to quantify existing ambient noise levels in the vicinity of the project site, three noise measurements were taken on July 31, 2025; refer to Exhibit 4.13-1, *Noise Measurement Locations*. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. Ten-minute measurements were taken, between 12:00 p.m. and 1:00 p.m.; refer Table 4.13-6, *Noise Measurements*. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day.

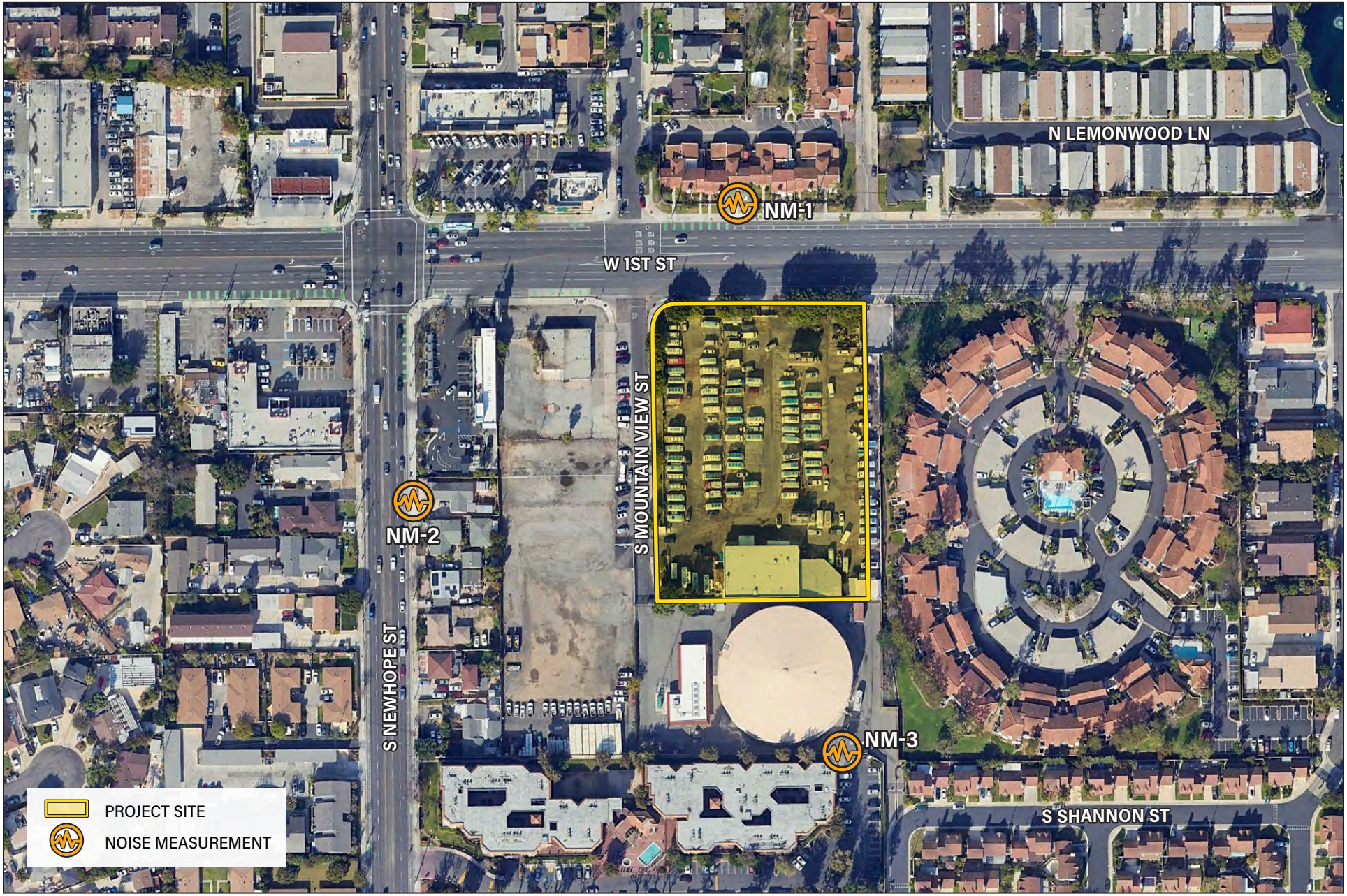
Table 4.13-6
Noise Measurements

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	Northeast corner of the Mountain View Street and First Street intersection	69.8	52.2	82.7	12:20 p.m.
2	In front of 201 South Newhope Street	69.2	48.4	80.3	12:37 p.m.
3	Parking lot of the Alder Court Apartments near Potomac Common	47.1	39.0	65.4	12:53 p.m.
Notes: dBA = A-weighted decibels, L_{eq} = Equivalent Sound Level; L_{min} = Minimum Sound Level; L_{max} = Maximum Sound Level, Peak = Highest Instantaneous Sound Level					
Source: Michael Baker International, July 31, 2025; refer to Appendix F, *Noise Analysis*.					

Meteorological conditions were sunny, warm temperatures, with light wind speeds (0 to 5 miles per hour). Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for sound level meters. The results of the field measurements are included in Appendix F, *Noise Analysis*.

2 City of Santa Ana, *City of Santa Ana General Plan: Noise Element*, *Figure N-1, Existing Noise Contours,* April 2022.

3 The Community Noise Equivalent Level (CNEL) is a rating of community noise exposure to all sources of sound that differentiates between daytime, evening, and nighttime noise exposure. These adjustments are +5 dBA for the evening, 7:00 p.m. to 10:00 p.m., and +10 dBA for the night, 10:00 p.m. to 7:00 a.m.



Source: Google Earth Pro, October 2025

Michael Baker INTERNATIONAL

NOT TO SCALE

10/2025 • JN 208279

FIRST & MOUNTAIN VIEW PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Noise Measurement Locations

Exhibit 4.13-1

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. It is difficult to specify noise levels that are generally acceptable to everyone; noise that is considered a nuisance to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels or based on studies of the ability of people to sleep, talk, or work under various noise conditions.

Construction

Construction Noise Impacts

Ground-borne noise and other types of construction-related noise impacts typically occur during the initial grading phase, which has the potential to create the highest levels of noise. Construction equipment produce maximum noise levels when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites typically operates under less than full power conditions, or part power. To characterize construction-period noise levels more accurately, the average (L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment simultaneously operating on part power.

Per Municipal Code Section 18-314(e), *Special Provisions*, construction activities are recognized as a part of urban life and would be exempt from provisions of the noise ordinance (exterior noise standards) provided that they occur within the allowed hours of construction. As such, the City does not have an established quantitative construction noise standard. Therefore, for the purpose of this analysis, construction noise associated with the proposed project would be compared to the construction noise standards adopted by the Federal Transit Administration (FTA). According to the FTA's *Transit Noise and Vibration Impact Assessment Manual*, a significant impact would occur if construction noise exceeds 80 dBA at residential uses.[4]

Sensitive receptors near the project site include adjacent residential uses directly to the north and east, with the closest sensitive receptors being the multi-family residences (Parkside Court Apartments) located directly adjacent to the east of the project site. However, construction activities would occur throughout the project site, and it should also be noted that construction noise levels would intermittently occur for a few days when construction equipment is operating closest to the nearest sensitive uses. The remainder of the time, the construction noise levels would be much lower because the equipment would be working in an area farther away from the existing sensitive uses. The General Noise Assessment methodology prescribed in the FTA *Transit Noise and Vibration Impact Assessment Manual*, recommends evaluating construction noise from the center of the site, stating under the variable distance in its construction noise calculation to "assume that all equipment operates at the center of the project." As such, the following evaluation would utilize the distance of 150 feet (geographical center of the project site to the property boundary line of the receptors to the east) to analyze potential construction noise.

The estimated construction noise levels at the nearest noise-sensitive receptors are presented in Table 4.13-7, *Construction Noise Levels at the Nearest Residential Receptors*. Noise levels from construction equipment and activities were modeled using the Federal Highway Administration's Roadway Construction Noise Model (RCNM); refer to Appendix F for detailed noise modeling output. Project construction equipment is based on CalEEMod results conducted for the proposed project which estimated the types and quantity of equipment that would be used on-site during each construction phase; refer to Appendix A, *Air Quality/GHG/Energy Analysis*. The quantity and type of

[4] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed September 23, 2025.

equipment were then inserted into RCNM to quantify the estimated noise levels generated at each nearby sensitive receptor. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment were assumed to operate simultaneously.

Table 4.13-7
Construction Noise Levels at the Nearest Residential Receptors

Phase	Estimated Exterior Construction Noise Level at 150 feet (Center of the Site to Residential Receptors to the East) (dBA L_{eq})[1]	Federal Transit Administration Construction Noise Threshold (dBA L_{eq})	Exceedance of Threshold?
Demolition	76.9	80	No
Grading	77.7		No
Building Construction	76.7		No
Paving	73.9		No
Architectural Coating	64.1		No

Notes:
1. These noise levels conservatively assume the simultaneous operation of all heavy construction equipment at the same precise location. Refer to Appendix A, *Air Quality/GHG/Energy Analysis* for a list of modeled heavy construction equipment.

Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM)*, 2006 (see Appendix F, *Noise Analysis*).

As shown in Table 4.13-6, construction-generated noise levels would range from 64.1 dBA L_{eq} to 77.7 dBA L_{eq} at the nearest sensitive receptor (multi-family residences) property boundary located approximately 150 feet to the southeast from the geographic center of the project site. Additionally, it should be noted that modeling of construction noise levels in Table 4.13-6 assumes that construction equipment would operate simultaneously and represents a worst-case scenario. Pursuant to Municipal Code Section 18-314(e), *Special Provisions*, construction activities are recognized as a part of urban life and would be exempt from provisions of the noise ordinance (exterior noise standards) provided that they occur within the allowed hours of construction. Construction would be permitted between the hours of 7:00 a.m. through 8:00 p.m. on weekdays and Saturdays. Construction would not be allowed on Sunday or on a federal holiday. Furthermore, as shown in Table 4.13-6, construction noise would not exceed FTA's construction noise significance threshold of 80 dBA. As such, a less than significant impact would occur in this regard.

Construction Trips Noise Impacts

Construction activities would also cause increased noise along access routes along West First Street and Newhope Street due to movement of equipment and workers, as well as haul trips. Truck trips associated with construction would mostly travel along West First Street and Newhope Street which then connects to State Route 22 (SR 22) or Interstate 405 (I-405). According to Caltrans, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA).[5] As such, a significant impact would occur if construction-related trips double existing traffic volumes.

According to the CalEEMod results, it is anticipated that project construction would generate a total maximum of 114 one-way trips per day, comprising of 90 one-way worker trips per day, seven one-way vendor trips per day, and 17 one-way hauling trips per day; refer to Appendix A. Based on 2023 through 2024 data, West First Street between Newhope Street and Harbor Boulevard currently has traffic volumes of approximately 29,261 average daily trips (ADT).[6] Additionally, Newhope Street between McFadden Avenue and West First Street as well as West First Street and Fifth Street has traffic volumes of 26,264 and 28,079 ADT, respectively. As such, project-related construction trips would not result in a doubling of the traffic volumes along First Street and Newhope Street, and therefore, would not

5 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol,* September 2013.
6 City of Santa Ana, *Traffic Census 2023-2024*, https://storage.googleapis.com/proudcity/santaanaca/2022/03/Traffic-Census-Report-2023_2024.pdf, accessed September 22, 2025.

generate a perceptible increase (3 dBA) in traffic noise. Additionally, mobile traffic noise from construction trips would be temporary and would cease upon project completion. Thus, impacts in this regard would be less than significant.

Operations

Mobile Noise

Future development generated by the proposed project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. According to Caltrans, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA). According to the *Focused Traffic Study for First & Mountain View Residential Project*, prepared by Linscott, Law & Greenspan, Engineers and dated September 23, 2025, the proposed project would generate approximately 379 average daily trips; refer to Appendix G, *Transportation Studies*. As discussed above, First Street between Newhope Street and Harbor Boulevard currently has traffic volumes of approximately 29,261 ADT.[7] Therefore, the project's trip generation (approximately 379 ADT) would not double existing traffic volumes and an increase in traffic noise along local roadways would be imperceptible. Project-related operational traffic noise impacts would be less than significant.

Stationary Noise Impacts

Stationary noise sources associated with the project would include those typical residential areas (e.g., mechanical equipment, crowd noise, etc.). These noise sources are typically intermittent and short in duration and would be comparable to existing sources of noise experienced at surrounding residential and commercial uses. Further, all stationary noise activities would be required to comply with the Municipal Code and California Building Code requirements pertaining to noise attenuation.

Mechanical Equipment

Since the proposed project would construct a total of 61 townhome units, the project would include heating, ventilation, and air conditioning (HVAC) units. Typically, mechanical equipment noise is approximately 66 dBA at 3 feet from the source.[8] Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source.[9] As shown on Exhibit 2-3, the HVAC units would be located on the ground level and along the frontage facing the interior drive aisles or sides of the buildings. For the purpose of this evaluation, the following analysis would utilize the *Transit Noise and Vibration Impact Assessment Manual* recommendation of evaluating stationary sources from the center of the site. At a distance of 150 feet (geographical center of the site the adjacent sensitive receptor), the noise level from a single HVAC unit would be approximately 32 dBA. The operation of 61 HVAC units would generate a combined noise level of approximately 49.9 dBA at the nearest sensitive receptors to the east (Parkside Court Apartments when operating simultaneously. The proposed project would construct a solid masonry wall along the eastern boundary of the project site which would block the line of sight and attenuate the noise by 8 dBA.[10] As such, noise levels from HVAC units would be approximately 41.9 dBA which would not exceed the City's daytime and nighttime exterior noise standards of 55 and 50 dBA, respectively, at the nearest sensitive receptors. Impacts would be less than significant in this regard.

Outdoor Gathering Area Noise

The project would include open space areas in various locations throughout the site; refer to Exhibit 2-3 and Exhibit 2-6. Specifically, open space areas are proposed in the central portion of the site, in the northwest corner, along the

7 Ibid,
8 Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.
9 Cyril M. Harris, *Noise Control in Buildings*, 1994.
10 Federal Highway Administration, *Roadway Construction Noise Model User's Guide*, January 2006.

western project boundary by the main driveway entry, and along the southern boundary. These open space areas have the potential to be accessed by groups of people intermittently for various occasions (e.g., events, other social gatherings, etc.). Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. Crowd noise is estimated at 60 dBA at one meter (3.28 feet) away for raised normal speaking.[11] This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members.[12] Therefore, crowd noise would be approximately 62 dBA at one meter from the source (i.e., open-air courtyard).

The open space area proposed along the southern boundary of the site would be the closest open space area to the nearest sensitive receptors (Parkside Court Apartments) approximately 20 feet to the east. At approximately 20 feet (property line of the project site to the building façade of the nearest receptor), crowd noise levels would be approximately 46 dBA. As such, crowd noise from the proposed project would not exceed the City's daytime and nighttime exterior noise standard of 55 and 50 dBA, respectively. Noise from crowds gathering at common open space areas would not be audible to the nearest sensitive receptors.

According to the Supreme Court of California ruling in the *Make UC a Good Neighbor v. the Regents of the University of California*, it was determined that "social noise" (noise created by humans) was not an environmental impact required by CEQA to be analyzed for residential projects. As such, Assembly Bill 1307 was signed into law in September 2023. Assembly Bill 1307 added Public Resources Code Section 21085 which states "For the purposes of this division, for residential projects, the effects of noise generated by the project occupants and their guest on human beings is not a significant effect on the environment". Therefore, the analysis shown above was only included for informational purposes. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact.

Construction

Project construction can generate varying degrees of groundborne vibration, depending on the construction phase and equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Caltrans *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. This evaluation uses the Caltrans architectural damage threshold for continuous vibrations at older residential structures of 0.3 inch-per-second PPV. As the nearest structures to project construction areas are residences, this threshold is considered appropriate. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural.

Since the nearest sensitive receptor buildings are multi-family residential buildings (Parkside Court Apartments) located as close as approximately 20 feet to the east when measured from the project boundary to the residence's building façade, the following would analyze the potential impacts from construction equipment at this distance. The proposed

[11] M.J. Hayne, et al, *Prediction of Crowd Noise*, Acoustics, November 2006.
[12] Ibid.

project would not use heavy equipment such as vibratory rollers or pile drivers during construction. Typical vibration produced by construction equipment is illustrated in Table 4.13-8, *Typical Vibration Levels for Construction Equipment*.

Table 4.13-8
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 20 feet (inch/sec)[1]
Large bulldozer	0.089	0.1138
Loaded trucks	0.076	0.0971
Jackhammer	0.035	0.0447
Small bulldozer	0.003	0.0038

Notes:
1. Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$
where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual, Table 7-4 Vibration Source Levels for Construction Equipment*, September 2018.

The groundborne vibration generated during construction activities would primarily impact existing sensitive uses that are located adjacent to the project site. As shown in Table 4.13-8, vibrations from the construction of the proposed project would range from 0.0038 to 0.1138 inch-per-second PPV at a distance of 20 feet. As a result, construction groundborne vibration would not be capable of exceeding Caltrans significance criteria of 0.3 inch-per-second PPV for human annoyance building damage at the nearest sensitive receptor. Therefore, vibration impacts would be less than significant impact during construction.

Operations

Implementation of the proposed project would not involve land uses that include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. Heavy duty trucks (i.e., delivery trucks, garbage collections trucks, etc.) would occasionally travel to and from the site. However, according to the FTA, it is unusual for vibration from sources, such as buses and trucks, to be perceptible, even in locations close to major roads.[13] As such, it can be reasonably inferred that operation of the proposed project would not create perceptible vibration impacts to the nearest sensitive receptors. Therefore, vibration impacts related to human annoyance and building damage during operation would be less than significant.

Mitigation Measures: 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 nearest airport to the project site is John Wayne Airport approximately 5.75 miles to the southeast. The project site is not located within the John Wayne Airport noise contours.[14] Additionally, the project site is not located

[13] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed September 23, 2025.

[14] John Wayne Airport, *John Wayne Airport Orange County 2024 Annual Community Noise Equivalent Level Contours,* https://files.ocair.com/media/2025-03/CNEL%20Noise%202024.pdf?VersionId=sP5JZJ.HJkeYtq9jJslfTN9s.mUL.i1n, accessed July 29, 2025.

within the vicinity of a private airstrip or related facilities. Therefore, project implementation would not expose people residing or working in the project area to excessive noise levels associated with aircraft. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

4.14 POPULATION AND HOUSING

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

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The proposed project would develop a 61-unit townhome community. Therefore, the project would result in direct growth in the City's population.

Based on the City's average household size of 3.82,[1] the project's 61 proposed units would introduce approximately 233 new residents. Therefore, the project would induce population growth in a local context. Conservatively assuming that all 233 new residents relocate from outside of the City, potential population growth associated with the project would represent 0.07 percent increase over the City's existing population of 315,325 persons as of 2025.[2]

Growth forecasts generated by Southern California of Governments (SCAG) for the regional plan, Connect SoCal, predict a steady increase in population through 2045. According to the General Plan, from 2020 to 2030, SCAG estimates that Santa Ana's population will grow by approximately 2,000 residents annually.[3] Santa Ana has nearly 7,000 units in the pipeline that, based on an average household size of three to four persons, may result in a population increase of 21,000 to 28,000 new residents by 2030.[4] The project's residential population (233 persons) represents 11.65 percent of the City's annual growth of 2,000 persons, and approximately 0.83 to 1.1 percent of the City's projected increase by 2030. While the project would induce direct population growth, the project would also support the General Plan by promoting housing near transit and converting commercial/industrial zoning into residential use (with low-income units) that supports the City's long-term housing goals.

Overall, the proposed project would not induce substantial unplanned population growth exceeding existing conditions (0.017 percent increase) and/or regional 2030 populations projection for the City (1 percent). As a result, the project would result in less than significant impacts related to population growth.

Mitigation Measures: No mitigation measures are required.

1 California Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2025, with 2020 Benchmark*, *Table 2: E-5 City/County Population and Housing Estimates, 4/1/2020,* May 2025.
2 Ibid.
3 City of Santa Ana, *City of Santa Ana General Plan Housing Element 2021-2029, Table A-1, Population Growth Trends*, September 16, 2022.
4 Ibid.

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

No Impact. There are no existing residences on-site. As such, project implementation would not displace existing people or housing and instead, would provide a 61-unit townhome community. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

4.15 PUBLIC SERVICES

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

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:

1) Fire protection?

Less Than Significant Impact. The Orange County Fire Authority (OCFA) provides fire protection services to the City, including the project site. The closest fire station is Station #78, located approximately 0.3-mile to the north of the project site at 501 North Newhope Street.

Construction

Construction activities associated with the proposed project would create a temporary increase in demand for fire protection services at the project site. However, construction activities would be subject to compliance with applicable State and local regulations in place to reduce risk of construction-related fire, such as installation of temporary construction fencing to restrict site access and maintenance of a clean construction site. As such, a less than significant impact would occur in this regard.

Operation

The proposed 61-unit development could create an increased demand for fire protection services. However, due to the infill nature of the project, the nominal population increase of approximately 233 persons would not result in the need for new or physically altered fire protection facilities; refer to Section 4.14, *Population and Housing*. The proposed project would be required to comply with OCFA requirements regarding emergency access, fire flow, fire protection standards, minimum fire lane widths, and other site design/building standards. The proposed project's internal drive aisles would be designed to meet OCFA requirements for minimum fire lane widths and turn radii; refer to Exhibit 2-3. In addition, the project would be subject to compliance with existing regulations specified in Municipal Code Chapter 14 Article I, *Fire Code*, which adopts by reference the California Fire Code. Further, the project site is already serviced by OCFA, and development of the proposed project would not expand OCFA's existing service area.

Further, pursuant to Municipal Code Section 8-46, *Fire Facilities Fee*, the project applicant would be required to pay a fire facilities fee prior to issuance of a building permit for construction of buildings exceeding two stories in height, including the proposed project. This fee would be utilized by OCFA to maintain and/or update facilities and staffing to ensure adequate services can be provided to the service area. Following compliance with OCFA and Municipal Code requirements and payment of the required fire facilities fee, the project's operational impacts to fire protection services would be less than significant, and the project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts.

Mitigation Measures: No mitigation measures are required.

2) Police protection?

Less Than Significant Impact. The Santa Ana Police Department (SAPD) provides police protection services to Santa Ana. The SAPD headquarters is located approximately 2.75 miles to the east of the site at 60 Civic Center Plaza. Additionally, a police sub-station is located approximately 0.7-mile to the southeast of the site at 3750 West McFadden Avenue.

Construction

Construction activities associated with the proposed project would create a temporary increase in demand for police protection services at the project site. However, construction activities would be subject to compliance with Municipal Code Chapter 8 Article II, *Building Code*, which adopts the California Building Code by reference. Chapter 33, *Safeguards During Construction*, of the California Building Code includes emergency access requirements which would minimize site safety hazards and potential construction-related impacts to police services. Compliance with existing regulations would ensure less than significant impacts occur in this regard.

Operation

Development of the proposed project would generate an increase in demand for police protection services. However, due to the infill nature of the project, the nominal population increase of approximately 233 persons would not result in the need for new or physically altered police protection facilities; refer to Section 4.14. Additionally, the project site is already serviced by SAPD and would not require the expansion of SAPD's existing service area. As stated, the proposed project would be designed in compliance with Municipal Code Chapter 8 Article II, *Building Code*, which adopts by reference the California Building Code. Additionally, Municipal Code Section 35-114, *Residential Development Tax*, imposes an excise tax on the privilege of engaging in residential development in the City. All tax revenues pursuant of this excise tax would be placed in the City's general fund which would fund public service facilities, including SAPD facilities. Following compliance with State and local site safety requirements as well as payment of the excise tax, the project's operational impacts to police services would be less than significant, and the project would not result in the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts.

Mitigation Measures: No mitigation measures are required.

3) Schools?

Less Than Significant Impact. The project site is located within the boundaries of the Garden Grove Unified School District (GGUSD). The schools serving the project site include Simmons Elementary School located at 11602 Steele

Drive in the City of Garden Grove, Fitz Intermediate School located at 4600 West McFadden Ave in the City of Santa Ana, and Los Amigos High School located at 16566 Newhope Street in the City of Fountain Valley.[1]

The project involves the development of 61 townhomes, which could generate additional students within the project area. Although the project could result in an increased demand for GGUSD school services, all new residential, commercial, and industrial construction projects are subject to GGUSD developer fees. Assembly Bill (AB) 2926 and Senate Bill (SB) 50 allow school districts to collect development impact fees. According to Section 65996 of the California Government Code, payment of statutory fees is considered full mitigation for new development projects. Thus, upon payment of required fees by the project Applicant consistent with existing GGUSD and State requirements, a less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

4) Parks?

Less Than Significant Impact. The City of Santa Ana Parks, Recreation and Community Services Agency currently operates and maintains 44 parks within the City. The nearest parks to the project site are Heritage Park, located approximately 0.39-mile southwest of the project site at 4812 West Camile Street, and Santa Anita Park, located approximately 0.47-mile east of the project site at 300 South Figueroa Street. Future residents associated with the proposed project could create an increased demand for park services. Pursuant to Municipal Code Section 35-110, *Fees*, any project adding net residential units or converting apartments to condominiums in the City would pay a fee for the purpose of preserving the balance between the demand for park and recreational facilities and residents. Additionally, Municipal Code Section 35-108, *Purpose*, states that all fees collected under the requirement of Municipal Code Section 35-110 would be placed in a Park Acquisition and Development Fund which would be used for the acquisition, construction, and renovation of park and recreational facilities. Due to the infill nature of the project, the nominal population increase of approximately 233 persons would not result in the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts. As such, upon payment of fees outlined in Municipal Code Section 35-110, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

5) Other public facilities?

Less Than Significant Impact. Other public facilities that could potentially be impacted by the proposed project include library services. The Santa Ana Public Library (SAPL) system currently serves the City, including the project site. The closest library is the Newhope Library, located approximately 0.1-mile northwest of the project site at 122 North Newhope Street. The Main Library is located approximately 3.1 miles east of the project site at 26 Civic Center Plaza. Due to the infill nature of the project, the nominal population increase of approximately 233 persons is not anticipated to result in a significant impact on SAPL's services. Additionally, Municipal Code Section 35-114, *Residential Development Tax*, imposes an excise tax on the privilege of engaging in residential development in the City. All tax revenues pursuant of this excise tax would be placed in the City's general fund which would fund public service facilities, including the SAPL facilities. Upon payment of the excise tax pursuant to Municipal Code Section 35-114, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

[1] Garden Grove Unified School District, *SchoolSite Locator*, https://www.schoolsitelocator.com/apps/gardengrove/, accessed July 23, 2025.

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4.16 RECREATION

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

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?

Less Than Significant Impact. As stated in Response 4.15(a)(4), future residents associated with the proposed project could create an increased demand for park and recreational facilities services. However, pursuant to Municipal Code Section 35-110, *Fees*, any project adding net residential units or converting apartments to condominiums in the City would pay a fee for the purpose of preserving the balance between the demand for park and recreational facilities and residents. Additionally, Municipal Code Section 35-108, *Purpose*, states that all fees collected under the requirement of Municipal Code Section 35-110 would be placed in a Park Acquisition and Development Fund which would be used for the acquisition, construction, and renovation of park and recreational facilities. Thus, the proposed project would not result in a substantial increase in demand on existing parks or other recreational facilities and would not result in the physical deterioration of these facilities. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

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?

Less Than Significant Impact. As discussed in Section 2.4, *Project Characteristics*, the project would provide a 3,710-square foot central open space/picnic area and associated amenities (i.e., pedestal barbecue and hot coal grill, picnic table, pedestrian bench, and bike racks). Additionally, an approximately 635-square foot elevated corner plaza with enhanced paving and raised planter boxes is proposed in the northwest corner of the site adjacent to the proposed live/work units. Furthermore, a 5,266-square foot open space with a meandering walkway with benches would be constructed along the southern project boundary to provide pedestrian access to each building. For each townhome unit, private open space (second-story deck or patio) would be provided. The project's potential environmental impacts related to the construction of these proposed on-site recreational amenities are analyzed throughout this Initial Study. Compliance with applicable laws, ordinances, and regulations would ensure that the project's impacts are reduced to a less than significant level in this regard.

Mitigation Measures: No mitigation measures are required.

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4.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) and/or the thresholds of significance set forth in Section 5.09, *Determining the Significance of Transportation Impacts*, Table 1, of the City of Santa Ana's Local CEQA Guidelines?			✓	
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?				✓

This section is primarily based on the following technical studies (refer to Appendix G, *Transportation Studies*):

- *Vehicle Miles Traveled (VMT) Analysis, 61 Townhouse Units, 4320 West First Street, Santa Ana California* (VMT Analysis), prepared by Blodgett Baylosis Environmental Planning, dated March 3, 2026; and
- *Focused Traffic Study for 1st & Mountain View Residential Project* (Traffic Study), prepared by Linscott, Law & Greenspan, Engineers, dated April 13, 2026.

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

Less Than Significant Impact. Paved sidewalks along West First Street and South Mountain View Street provide pedestrian access to the project site. The stop-controlled intersection of West First Street and Mountain View Street is not improved with any pedestrian crosswalks; however, the signalized intersection of West First Street and Newhope Street 325 feet to the west of the site is improved with pedestrian crosswalks at each corner. According to the General Plan Mobility Element, West First Street is improved with a Class IV Cycle Track, and aerial imagery indicates bicycle facilities on both sides of the roadway. Transit access to the project site is provided by Orange County Transportation Authority (OCTA) Route 64 bus, with the eastbound First Street/Newhope Street stop located approximately 93 feet west of the project site, and the eastbound First Street/Newhope Street stop located approximately 436 feet northwest of the project site.

Regional vehicular access to the project site is provided via State Route 22 (SR-22), Interstate 405 (I-405), and Interstate 5 (I-5). Local access to the project site is provided via South Newhope Street, West First Street, and South Mountain View Street, and the site is directly accessible from South Mountain View Street via a driveway near the southwest corner of the site. According to the General Plan Mobility Element, West First Street along the project site's frontage is designated as a Major Arterial, which, fully improved, has a 120-foot right-of-way, including six travel lanes with a 14-foot median and 10-foot sidewalks on each side; improvements such as transit and bicycle facilities are typical as well. According to the General Plan Mobility Element, South Mountain View Street along the project site's western boundary is a local street; local streets typically provide two travel lanes intended to serve residents and local businesses, and they typically include pedestrian sidewalks and on-street parking and may include shared bicycle routes.

Under the proposed project, vehicular access would be provided by an improved driveway along South Mountain View Street. Pedestrian access would be provided along West First Street via a lockable entry/exit tubular steel gate, as well as an additional lockable exit-only tubular steel gate. Up to 136 vehicle parking spaces would be provided, including 122 covered garage parking spaces and 14 open/guest surface parking spaces. Bicycle storage spaces would be provided near the driveway entrance along South Mountain View Street as well as near the proposed central open space area within the residential development. No changes to existing transit, bicycle, or pedestrian facilities are proposed as part of the project. Therefore, project development would not conflict with any program plan, ordinance, or policy addressing the circulation system in the project area. Roadway impacts are analyzed under Response 4.17(b). A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) and/or the thresholds of significance set forth in Section 5.09, Determining the Significance of Transportation Impacts, Table 1, of the City of Santa Ana's Local CEQA Guidelines?

Less Than Significant Impact. As detailed in Table 4.17-1, *Project Trip Generation*, the project is forecast to generate approximately 379 average daily trips, including 25 a.m. peak hour trips and 32 p.m. peak hour trips.

Table 4.17-1
Project Trip Generation

Land Use Code/ Project Description	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Trip Generation Rate							
220: Multifamily Housing (Low-Rise)	6.21	24%	76%	0.41	62%	38%	0.52
Project Trip Generation							
Multi-Family Housing (61 units)	379	6	19	25	20	12	32
Total Project Trip Generation	**379**	**6**	**19**	**25**	**20**	**12**	**32**
Source: Refer to Appendix G.							

Section 2.1 of the *City of Santa Ana Traffic Impact Study Guidelines*[1] states that a project can be screened out from a vehicle miles traveled (VMT) assessment and can be assumed to have a less than significant transportation impact if the project meets one of the following criteria:

1. The project is located within a Transit Priority Area (TPA);

2. The project is located in a low VMT generating area; or

3. The project generates fewer than 110 net daily vehicle trips or is a local-serving retail land use less than 50,000 square feet in area.

Pursuant to *Cleveland National Forest Foundation v. County of San Diego* (2025), local agencies may no longer rely on generic, Statewide thresholds for determining whether VMT impacts would be less than significant, and should instead perform local or regional-specific analysis of whether such projects would generally result in an insignificant transportation effect. Specifically, the Office of Planning and Research (OPR) recommended "small project" threshold of 110 vehicle trips a day or less was invalidated, among other thresholds. Thus, Criteria 3 from the *City of Santa Ana Traffic Impact Study Guidelines* was not utilized to evaluate the project's VMT impacts. It can also be noted that the

[1] City of Santa Ana, *City of Santa Ana Traffic Impact Study Guidelines*, September 2019.

project would not meet the screening threshold for Criteria 3 as the project would generate more than 110 net daily trips; refer to Table 4.17-1.

In order to fully meet the VMT analysis screening criteria under Criteria 1 (TPA) and 2 (Low VMT Area), secondary screening steps must also be met as described in Section 2.1 of the *City of Santa Ana Traffic Impact Study Guidelines*.

- Criteria 1 (TPA) Secondary Screening Step: Verify the proposed project's consistency with the assumptions from the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This consistency can be a land use review (e.g., are the proposed land uses already included in the RTP/SCS) or can be reviewed from a VMT per service population (VMT/SP) perspective (e.g., does the resulting land use increase or decrease the VMT/SP in the Traffic Analysis Zone [TAZ] compared to the RTP/SCS assumptions).

- Criteria 2 (Low VMT Area) Secondary Screening Steps:

    - Verify that the proposed land use is consistent with the existing land use that is generating low VMT/SP (e.g., a comparison of land use type, density, demographics, etc.).

    - Verify that the proposed land use is consistent with RTP/SCS assumptions or the project decreases VMT/SP compared to the RTP/SCS.

As detailed in the VMT Analysis, the project site is located within a half-mile buffer of a high-quality bus stop (Criteria 1) and within a low VMT generating area (Criteria 2).

- Criteria 1 (TPA) Screening Analysis: The proposed project is located within a half-mile buffer of a high-quality bus stop as shown in the Santa Ana Transit Priority Areas Map; refer to VMT Analysis Exhibit 6, *Santa Ana Transit Priority Areas*. A project would be consistent with the RTP/SCS assumptions if the land use growth projections already assume growth in households or employment greater than or equal to the project. According to growth forecasts generated by Southern California of Governments (SCAG) for the regional plan, Connect SoCal, and as detailed in Section 4.14, *Population and Housing*, Santa Ana has nearly 7,000 units in the pipeline that, based on an average household size of three to four persons, may result in a population increase of 21,000 to 28,000 new residents by 2030.[2] The project's residential population (233 persons) represents 11.65 percent of the City's annual growth of 2,000 persons, and approximately 0.83 to 1.1 percent of the City's projected increase by 2030. Overall, the proposed project would not induce substantial unplanned population growth and would be below SCAG projections. Therefore, the project would meet Screening Criteria 1 (TPA).

- Criteria 2 (Low VMT Area) Screening Analysis: According to VMT Analysis Exhibit 7, *VMT/SP in Santa Ana as Compared to Orange County Average*, the proposed project is located within an area with VMT/SP below 15 percent the Orange County average, and thus, is within a low VMT generating area. Although the project is consistent with SCAG's RTP/SCS growth forecast assumptions, the proposed land use (Urban Neighborhood-Low; UN-20) would not be considered a low or lower VMT/SP land use compared to the site's existing land use (General Commercial [GC] and Low-Medium Density Residential [LMR-11]). Therefore, the project would not meet Screening Criteria 2 (Low-VMT Area).

Overall, the project would meet the screening requirements for Criteria 1 (TPA) and would result in a less than significant impact in this regard.

Mitigation Measures: No mitigation measures are required.

[2] Ibid.

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 does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment or trucking facilities). Under existing conditions, the portion of South Mountain View Street that bounds the project site to the west terminates to the south in a cul-de-sac; this cul-de-sac provides access to the City of Santa Ana Public Works Department water reservoir to the south and a City yard to the west of the site.

Project implementation includes improvements to the existing South Mountain View Street cul-de-sac. Specifically, in coordination with the City, a portion of the existing right-of-way would be vacated to reduce the length of the cul-de-sac. A portion of the existing right-of-way would be transferred to the project site. The City and project Applicant have agreed to improve South Mountain View Street to the full extent of the reduced right-of-way. This proposed roadway improvement, as well as proposed site access and internal site circulation improvements, would be subject to review by the City's traffic engineer and the Orange County Fire Authority (OCFA) for compliance with applicable design and safety standards.

The Traffic Study included several analyses, including a project site access evaluation, queuing analysis (from westbound left-turn and northbound shared left/through/right-turn lanes on South Mountain View Street), traffic signal warrant analysis, internal circulation evaluation, and sight distance evaluation. Based on the results, the Traffic Study concluded that project site access, line of site from project driveways, and internal circulation for trash truck and fire truck turning maneuvers would all be adequate and meet local and State standards. Additionally, it was determined that project implementation would not warrant a signal at the West First Street and South Mountain View Street intersection. Overall, following approval by the City's traffic engineer and OCFA, project implementation would not increase transportation hazards due to a geometric design feature, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Result in inadequate emergency access?

No Impact. Project construction would require demolition of the existing structure located in the southern portion of the project site. The portion of South Mountain View Street that bounds the project site to the west terminates in a cul-de-sac to the south, and neighbors an adjacent lot utilized as a City yard. Improvements to the cul-de-sac in coordination with the City are detailed in Response 4.17(c). Given the project location and surrounding land uses, if temporary, partial lane closures along South Mountain View Street are required during construction activities, it is not anticipated that these closures would result in inadequate emergency access.

Vehicular access to the project site would be provided by an improved driveway along South Mountain View Street. Internal drive aisles would provide access to each building. The main drive aisle would be 20 feet in width to provide adequate space for fire access. The proposed 20-foot wide ingress/egress access point from South Mountain View Street would widen into a 28-foot-wide, two-way turn drive aisle into the site's internal circulation network, where drive aisles range in width from 20 to 33 feet. As depicted in Exhibit 2-3, *Conceptual Site Plan*, project circulation would comply with OCFA's design and fire safety standards for turning radii, hammer head turns, and S-curve turns; project plans would be reviewed by OCFA and the City's traffic engineer. As such, project implementation would not result in inadequate emergency access, and no impact would occur.

Mitigation Measures: No mitigation measures are required.

4.18 TRIBAL CULTURAL RESOURCES

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

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this Initial Study.

a) 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:

1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. As analyzed in Section 4.5, *Cultural Resources*, no historic resources listed or eligible for listing in a State or local register of historic resources are located within the project site. Thus, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. In compliance with AB 52, the City distributed letters notifying each tribe that requested to be on the City's list for the purposes of AB 52 of the opportunity to consult with the City regarding the proposed project. Concurrently, the City distributed letters notifying tribes of the opportunity to consult with the City regarding the proposed project for the purposes of Senate Bill 18 (SB 18); refer to Appendix H, *SB 18/AB 52 Documentation*. The letters were distributed by certified mail on September 8, 2025. The tribes had 30 and 90 days to respond to the City's request for consultation pursuant to AB 52 and SB 18, respectively. The Gabrieleño Band of Mission Indians – Kizh Nation responded to the consultation letter; no other tribes responded.

The City and Gabrieleño Band of Mission Indians – Kizh Nation consulted via email and agreed to include Mitigation Measures TCR-1 through TCR-3 to reduce the project's potential impacts to tribal cultural resources. Mitigation Measure TCR-1 would require the project Applicant to retain a Native American Monitor acceptable by the Gabrieleño Band of Mission Indians – Kizh Nation to be present on-site during ground-disturbing activities. Mitigation Measure TCR-2 provides clear procedures for construction contractors to follow in the event unanticipated discovery of tribal cultural resource objects occurs. Mitigation Measure TCR-3 provides clear guidance and detail specific regulations pertaining to the handling of human remains (including Native American human remains) in the event unanticipated discovery of human remains and associated funerary or ceremonial objects occurs. Overall, implementation of Mitigation Measures TCR-1 through TCR-3 would ensure potential project impacts on previously undiscovered tribal cultural resources are reduced to less than significant levels. As such, project impacts in this regard would be less than significant with mitigation incorporated.

Mitigation Measures:

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

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

B. A copy of the executed monitoring agreement shall be submitted to the City of Santa Ana Planning Division prior to 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 would 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 tribal cultural resources (TCRs), including, but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., 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 of Santa Ana Planning Division upon written request to the Tribe.
D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Tribe from a designated point of contact for the project Applicant/City of Santa Ana Planning Division 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 Tribe to the project Applicant/City of Santa Ana Planning Division that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact the Tribe's TCRs.

TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any tribal cultural resources (TCRs), all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by a Native American Monitor and/or an archaeologist acceptable by the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe). The Tribe shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.

A. Native American human remains are defined in the California Public Resources Code (PRC) Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, refer to as "associated grave goods" in PRC 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 PRC 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 PRC Sections 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.

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4.19 UTILITIES AND SERVICE SYSTEMS

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

a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

The project site would be served by the City of Santa Ana Water Resources Division. Existing 4- and 24-inch water lines are located within West First Street. Proposed eight-inch private domestic water lines and eight-inch fire water lines would be constructed on-site to connect to existing public water facilities in West First Street. The project's potential environmental impacts for construction of the proposed water connections and infrastructure have been analyzed throughout this Initial Study. As analyzed, construction of the proposed development (inclusive of associated infrastructure installation) is not anticipated to result in significant environmental impacts. Construction of the project's water facilities would be subject to compliance with all applicable local, State, and federal laws, ordinances, and regulations. Payment of standard water connection fees, ongoing user fees, and development impact fees under Municipal Code Section 39-2, *Water and Sewer Systems Development Impact Fees*, would ensure that the project's impacts on existing water facilities are adequately offset, and these utility services could continue to accommodate the proposed development. Additionally, all private water lines are required to be designed and constructed in accordance with the latest edition of the Standard Specifications for Public Works Construction, the American Water Works Association Standards, and the California Waterworks Standards per Municipal Code Section 39-3, *Water and Sewer Systems Design Standards*.

Further, given that the previous use on-site (i.e., food truck storage and commissary operations) was previously served by the City's Water Resources Division, it is not anticipated that project implementation would require construction of

new or expanded water facilities that could result in significant environmental effects. A less than significant impact would occur in this regard.

Wastewater/Sewer

The City of Santa Ana Public Works Department would provide sanitary sewer service to the project site. An existing 21-inch sewer line is located under West First Street, and an 8-inch sewer line is located under South Mountain View Street. Eight-inch private sewer laterals would be constructed on-site to connect to existing sewer facilities in South Mountain View Street. Wastewater generated on-site would be collected by the City's existing sewer network and conveyed to the Orange County Sanitation Districts (OCSD) trunk mainlines for conveyance and treatment.

The City operates and maintains the local sewer system consisting of over 390 miles of pipeline, 7,630 manholes, and two lift stations that connect to Orange County Sanitation District's (OCSD's) trunk system to convey wastewater to OCSD's treatment plants. OCSD has an extensive system of gravity flow sewers, pump stations, and pressurized sewers. Collected wastewater is sent to OCSD's plants located in the Cities of Huntington Beach and Fountain Valley. OCSD Reclamation Plant No. 1 in Fountain Valley has a capacity of 320 million gallons per day (mgd) and OCSD Reclamation Plant No. 2 in Huntington Beach has a capacity of 312 mgd. Both plants share a common ocean outfall, but Plant No. 1 currently provides all its secondary treated wastewater to OCWD's Groundwater Replenishment System (GWRS) for beneficial reuse. The 120-inch diameter ocean outfall extends four miles off the coast of Huntington Beach. A 78-inch diameter emergency outfall also extends 1.3 miles off the coast. According to OCSD's website, average daily flow of wastewater received in OCSD Reclamation Plant No. 1 in 2024 is 116 mgd, and flow received at OCSD Reclamation Plant No. 2 in 2024 is 68 mgd; these facilities collectively received and treated 184 mgd of wastewater in 2024.[1]

Project implementation could generate approximately 0.1159 mgd of wastewater.[2,3] Given the capacity available at OCSD Reclamation Plants No. 1 and No. 2, sufficient capacity exists to serve the project and new wastewater treatment facilities or expansion of existing facilities would not be necessary. Notwithstanding, the project applicant would be required to coordinate with the City for sewer facilities connection and pay standard wastewater connection fees and ongoing user fees to ensure that sufficient wastewater treatment capacity would be available in the future. Additionally, sewer development impact fees would be required per Municipal Code Section 39-2. Payment of these fees would fund improvements and upgrades to the City and OCSD sanitary sewer lines and facilities, as needed, and would offset the project's increase in demand for wastewater collection services. Following compliance with relevant laws, ordinances, and regulations, it is not anticipated that project implementation would require construction of new or expansion of existing wastewater facilities that would result in a significant environmental effect. Impacts would be less than significant in this regard.

Stormwater

The proposed project would install catch basins to convey surface stormwater runoff into a modular wetland biofiltration vault system to be treated. Once the water is treated, it would be conveyed through an underground storm drain system

1 Orange County Sanitation District, *Regional Sewer Service*, https://www.ocsan.gov/regional-sewer-service/, accessed September 18, 2025.

2 Stantec Consulting and Hildebrand Consulting, *City of Santa Ana, CA, 2019 Water, Recycled Water, & Sewer Rate Study Report*, October 1, 2019.

3 According to City's *2019 Water, Recycled Water, & Sewer Rate Study* Table 3-12, *Water Customer Class Units of Service*, multi-family customers within the City (3,713 multi-family units) generated an annual water flow of 4,257,723 hundred-cubic foot (hcf) in 2018, which is equivalent to 1,146.7 hcf per unit annually. To account for difference in sewer usage, a "return-to-sewer" factor of 80 percent is applied since not all water use returns to the sewer in the same proportion for different types of sewer customers; refer to Table 3-14, *Sewer Customer Class units of service*. Using 365 days per year for calculation, each multi-family unit within the City is estimated to generate approximately 2.513 hcf sewer water per day, which is equivalent to approximately 1,879.85 gallons per day per unit or 0.0019 mgd per unit. As such, the proposed 61 townhome units could generate approximately 0.1159 mgd of sewer water.

to a proposed stormwater sump pump. The sump pump would discharge runoff through a proposed parkway drain into the public right-of-way of South Mountain View Street. The project's potential environmental effects for construction of the abovementioned stormwater drainage improvements are analyzed in Section 4.10, *Hydrology and Water Quality*. As detailed in Section 4.10, construction of the new storm drain improvements would be subject to compliance with all applicable local, State, and federal laws, ordinances, and regulations. Compliance with relevant laws, ordinances, and regulations would ensure the project's impacts associated with the proposed storm drain improvements are reduced to less than significant levels.

Dry Utilities

The project site would be served by Southern California Edison (SCE), AT&T, and Time Warner Cable for electricity, telephone, and cable TV services, respectively. New private electricity connections would be constructed on-site to connect to existing service lines in South Mountain View Street and/or West First Street. No natural gas services would be utilized by the proposed project. The project's potential environmental impacts for construction in this regard have been analyzed throughout this Initial Study. As analyzed, construction of the proposed townhome development (inclusive of construction for new private utility connections) is not anticipated to result in significant environmental impacts. Construction of the project's dry utilities would also be subject to compliance with all applicable local, State, and federal laws, ordinances, and regulations. SCE has issued a will-serve letter for the proposed development and payment of standard utility connection fees and ongoing user fees are required to ensure these utility services would continue to be able to accommodate the proposed development.[4] Impacts would be less than significant in this regard.

Mitigation Measures: 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 of Santa Ana prepared a 2020 Urban Water Management Plan (2020 UWMP) to satisfy the Urban Water Management Plan Act of 1983 and subsequent California Water Code requirements. UWMPs are comprehensive documents that present an evaluation of a water supplier's reliability over a long-term (20 to 25 year) horizon. The City's 2020 UWMP provides an assessment of the present and future water supply sources and demands within the City's service area. It presents an update to the 2015 UWMP on the City's water resource needs, water use efficiency programs, water reliability assessment and strategies to mitigate water shortage conditions. It also presents a new 2020 Water Shortage Contingency Plan designed to prepare for and respond to water shortages. The following information is directly from the 2020 UWMP.

Table 4.19-1, *Total Water Use (Potable and Non-Potable)*, details the City's anticipated total water demand for potable and non-potable (i.e., recycled) water from 2025 through 2045. The City currently provides recycled water in its service area and is projected to grow its use. The demand data presented accounts for passive savings in the future. Passive savings are water savings as a result of codes, standards, ordinances and public outreach on water conservation and higher efficiency fixtures. Passive savings are anticipated to continue through 2045 and would result in continued water saving and reduced consumption levels.

[4] Southern California Edison, *4320 W. 1st St./Multi-family Residential/Santa Ana, CA*, January 13, 2025.

Table 4.19-1
Total Water Use (Potable and Non-Potable)

	2020	2025	2030	2035	2040	2045
Potable Water, Raw, Other Non-potable	33,240	33,633	34,146	33,881	33,589	33,578
Recycled Water Demand	249	249	249	249	249	249
Total Water Use	**33,489**	**33,882**	**34,395**	**34,130**	**33,838**	**33,827**

Notes: Units are in acre-feet.
Source: Arcadis U.S., Inc., *City of Santa Ana 2020 Urban Water Management Plan*, *Table 4-4 Retail: Total Water Use (Potable and Non-Potable)*, June 2021.

The City meets its water demands through a combination of imported water, local groundwater, and recycled water. The City works together with two primary agencies, Metropolitan Water District of Southern California (MWD) and Orange County Water District (OCWD), to ensure a safe and reliable water supply to continue serving the community in periods of drought or shortage.

The City's main source of water supply is groundwater from the Orange County Groundwater Basin. Imported water and recycled water make up the rest of the City's water supply portfolio. According to the 2020 UWMP, in 2019 to 2020, the City relied on 76 percent groundwater, 23 percent imported water, and one percent recycled water. It is projected that by 2045, the water supply portfolio will change to approximately to 84 percent groundwater, 15 percent imported water, and one percent recycled water. However, the City has a ten-year purchase agreement with MWD that allows the City to purchase significantly more water from MWD, should the need arise.

According to the 2020 UWMP, the City would be able to meet projected demands during normal, dry, and multiple dry years through 2040; refer to Tables 4.19-2, *Normal Year Supply and Demand Comparison*, through 4.19-4, *Multiple Dry Year Supply and Demand Comparison*.

Table 4.19-2
Normal Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals	33,882	34,395	34,130	33,838	33,827
Demand Totals	33,882	34,395	34,130	33,838	33,827
Difference	0	0	0	0	0

Notes: Units are in acre-feet.
Source: Arcadis U.S., Inc., *City of Santa Ana 2020 Urban Water Management Plan*, *Table 7-2: Retail: Normal Year Supply and Demand Comparison*, June 2021.

Table 4.19-3
Single Dry Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals	35,915	36,459	36,178	35,868	35,857
Demand Totals	35,915	36,459	36,178	35,868	35,857
Difference	0	0	0	0	0

Notes: Units are in acre-feet.
1. It is conservatively assumed that a single dry year demand is six percent greater than each respective year's normally projected total water demand. Groundwater is sustainably managed through the OCWD's basin production percentage (BPP) and robust management measures, direct and indirect recycled water uses provides additional local supply, and based on MWD's UWMP, imported water is available to close any potable water supply gap that local sources cannot meet.

Source: Arcadis U.S., Inc., *City of Santa Ana 2020 Urban Water Management Plan, Table 7-3: Retail: Single Dry Year Supply and Demand Comparison*, June 2021.

Table 4.19-4
Multiple Dry Year Supply and Demand Comparison

		2025	2030	2035	2040	2045
First Year	Supply Totals	35,581	36,024	36,403	36,116	35,866
	Demand Totals	35,581	36,024	36,403	36,116	35,866
	Difference	0	0	0	0	0
Second Year	Supply Totals	35,665	36,133	36,347	36,054	35,864
	Demand Totals	35,665	36,133	36,347	36,054	35,864
	Difference	0	0	0	0	0
Third Year	Supply Totals	35,748	36,241	36,290	35,992	35,861
	Demand Totals	0	0	0	0	0
	Difference	35,748	36,241	36,290	35,992	35,861
Fourth Year	Supply Totals	35,831	36,350	36,234	35,930	35,859
	Demand Totals	35,831	36,350	36,234	35,930	35,859
	Difference	0	0	0	0	0
Fifth Year	Supply Totals	35,915	36,459	36,178	35,868	35,857
	Demand Totals	35,915	36,459	36,178	35,868	35,857
	Difference	0	0	0	0	0

Notes: Units are in acre-feet.
1. It is conservatively assumed that a five consecutive dry year scenario is a repeat of the single dry year (106 percent of projected normal year values) over five consecutive years. The 2025 column assesses supply and demand for fiscal year 2020-2021 through fiscal year 2024-2025; the 2030 column assesses fiscal year 2025-2026 through fiscal year 2029-2030 and so forth, in order to end the water service reliability assessment in fiscal year 2044-2045. Groundwater is sustainably managed through the OCWD's basin production percentage and robust management measures, direct and indirect recycled water uses provide additional local supply, and based on MWD's UWMP, imported water is available to close any potable water supply gap that local sources cannot meet.

Source: Arcadis U.S., Inc., *City of Santa Ana 2020 Urban Water Management Plan, Table 7-4: Retail: Multiple Dry Years Supply and Demand Comparison*, June 2021.

Based on the project's CalEEMod modeling, the project would result in a water demand of approximately 2,289,065 gallons per year for indoor water and 194,980 gallons per year for outdoor water; refer to Appendix A. The project's estimated water demand total for indoor and outdoor use would be approximately 2,484,045 gallons, or 7.62 acre-feet per year, which would represent less than one percent of the City's total water demand of 33,882 acre-feet for 2025. Further, the project would be required to comply with water efficiency standards in the latest Title 24 and CALGreen standards. Thus, project implementation is not anticipated to adversely impact the City's water supply and the City would continue to have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

Mitigation Measures: 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 proposed townhome development would result in the generation of wastewater beyond existing conditions (i.e., a vacant site). However, there is substantial remaining capacity for wastewater treatment at OCSD's two treatment plants to serve the project's projected demand; refer to Response 4.19(a). The project's wastewater treatment demand projected would represent a nominal amount of OCSD's treatment capacity at the OCSD Reclamation Plant No. 2. Following compliance with relevant laws, ordinances, and regulations, it is not anticipated that the project's wastewater treatment demand, in addition to OCSD's existing commitments, would exceed capacity. A less than significant impact would occur in this regard.

Mitigation Measures: 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. Republic Services provides residential waste collection for the City, including the project site.[5] Based on California Department of Resources Recycling and Recovery (CalRecycle) data, the City disposed approximately 362,456 tons of solid waste in 2024 (the latest year of which data is available).[6]

According to the General Plan EIR, solid waste generated within the City is delivered to 17 landfills. Of these, Frank R. Bowerman Sanitary Landfill received the largest amount of waste in 2018 (296,256 tons); Olinda Alpha Sanitary Landfill received 35,094 tons in 2018. Table 4.19-5, *Primary Landfills Serving the City*, details landfill capacity and closing dates for the two primary landfill sites that receive solid waste from the City.

Table 4.19-5
Primary Landfills Serving the City

Landfill/Location	Maximum Permitted Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Frank R. Bowerman Sanitary Landfill 11002 Bee Canyon Road, Irvine, CA 92618	11,500	160,896,082	2053
Olinda Alpha Landfill 1942 North Valencia Avenue, Brea, CA 92823	8,000	17,500,000	2036
Total	19,500	178,396,082	--

Source: California Department of Resources Recycling and Recovery, *SWIS Facility/Site Search*, https://www2.calrecycle.ca.gov/SWFacilities/Directory, accessed September 18, 2025.

Construction

Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. Further, all construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." The 2022 CALGreen standards require that demolition and construction activities recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. CALGreen also includes design and construction measures that act to reduce construction-related waste through material conservation and other construction-related efficiency measures. Compliance with these regulations would ensure the project's construction-related solid waste impacts would be less than significant.

Operation

Per the City's General Plan EIR, the City has a target disposal maximum rate of 7.5 pounds per capita per day and 16.9 pounds per employee per day. The General Plan EIR provides solid waste generation factors of 12.23 pounds per household per day for residential uses and 0.043 pounds per square feet per day for nonresidential uses. Based on these solid waste generation rates, project operations would generate approximately 746 pounds of solid waste per day (61 units * 12.23 pounds per day); at least 75 percent of which is required by California law (AB 341) to be recycled,

[5] City of Santa Ana, *Trash and Recycling*, https://www.santa-ana.org/trash-recycling/, accessed September 18, 2025.
[6] California Department of Resources Recycling and Recovery, *RDRS Report 1: Overall Jurisdiction Tons for Disposal and Disposal Related Uses*, https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/OverallJurisdictionTonsForDisposal, accessed September 18, 2025.

which would reduce the project's volume of landfilled solid waste to approximately 186.5 pounds per day, or 68,075 pounds per year (34 tons per year).

The project's solid waste represents less than one percent of the total maximum daily permitted throughput capacities of the landfills identified in Table 4.19-5. As such, the project is not anticipated to 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. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. Refer to Response 4.19(d). The proposed project would be required to comply with all applicable federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and City recycling programs. Specifically, the project would be subject to AB 939, which requires that at least 50 percent of waste produced is recycled, reduced, or composted. On a local level, the project would be subject to compliance with Municipal Code Chapter 16 Article II, *Solid Waste Collection Regulations*. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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4.20 WILDFIRE

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

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

No Impact. According to the California Department of Forestry and Fire Protection's *Fire Hazard Severity Zone Viewer*, the project site is not located in or near a State Responsibility Area (SRA) nor classified as a Very High Fire Hazard Severity Zone.[1] No impact would occur in this regard.

Mitigation Measures: 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. Refer to Response 4.20(a).

Mitigation Measures: 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. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

[1] California Department of Forestry and Fire Protection, *Fire Hazard Severity Zone Viewer*, https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/, accessed August 25, 2025.

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. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated. As concluded in Section 4.4, *Biological Resources*, the project site is disturbed and located within an urbanized area of the City. No sensitive plant or animal species occur on-site. Thus, the project would have no impact on sensitive plant or animal species. Additionally, as indicated in Section 4.5, *Cultural Resources*, and Section 4.18, *Tribal Cultural Resources*, no historic, archaeological, or tribal cultural resources occur on-site. Should previously undiscovered cultural or tribal cultural resources be uncovered during project ground-disturbing activities, implementation of Mitigation Measures CUL-1, and TCR-1 through TCR-3 would reduce the project's potential effects to less than significant levels. Overall, the project would not potentially 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.

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 Impact With Mitigation Incorporated. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 4.1 through 4.20, the proposed project would not result in any significant and unavoidable impacts upon implementation of project mitigation measures. Implementation

of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

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

Less Than Significant Impact With Mitigation Incorporated. Previous sections of this Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous discussions, the proposed project would not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and mitigation measures. Further, as a residential development, project features would be designed to meet the needs of humans and are not anticipated to result in direct or indirect adverse effects. Impacts would be less than significant in this regard.

4.22 REFERENCES

The following references were utilized during preparation of this Initial Study/Mitigated Negative Declaration. These documents are available for review at the City of Santa Ana Planning and Building Agency located at 20 Civic Center Plaza, Santa Ana, California 92701.

Arcadis U.S., Inc., *City of Santa Ana 2020 Urban Water Management Plan*, June 2021.

Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.

Blodgett Baylosis Environmental Planning, *Vehicle Miles Traveled (VMT) Analysis, 61 Townhouse Units, 4320 West First Street, Santa Ana California*, March 3, 2026.

C&V Consulting, Inc., *City of Santa Ana, County of Orange/Santa Ana Region Priority Project Preliminary Water Quality Management Plan*, May 2025.

C&V Consulting, Inc., *Preliminary Hydrology and Hydraulics Study for 201 S. Mountain View Street & 4320 W. 1st Street Tentative Tract No. 19391 In the City of Santa Ana, California*, June 2025.

California Air Pollution Control Officers Association, *California Emissions Estimator Model (CalEEMod)*, version 2022.1.

California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.

California Air *Resources* Board, *Anaheim-812 W Vermont Street, Daily 1 Hr Avg Carbon Monoxide Data, 2025*, https://www.arb.ca.gov/aqmis2/display.php?param=CO&units=007&year=2025&report=SITE1YR&statistic=DMAX1HR&site=3809&ptype=aqd&std15=, accessed September 22, 2025.

California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2022, Trends of Emissions and Other Indicators,* September 20, 2024.

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5.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, we recommend that the City of Santa Ana prepare a Mitigated Negative Declaration for the First & Mountain View Project. We find that the proposed project could have a significant effect on a number of environmental issues, but that mitigation measures have been identified that reduce such impacts to a less than significant level. We recommend that the second category be selected for the City of Santa Ana's determination (see Section 6.0, *Lead Agency Determination*).

4/29/2026
Date

Frances Yau, AICP, Project Manager
Michael Baker International

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6.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

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

Signature:	Nancy Tran
Title:	Senior Planner
Printed Name:	Nancy Tran, AICP
Agency:	City of Santa Ana
Date:	4/29/2026

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