

City of Tustin
17332 Irvine Boulevard Residential Project
Draft Initial Study / Mitigated Negative
Declaration
September 2026



Lead Agency:



City of Tustin

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- B. 17332 Irvine Boulevard Residential Project Air Quality & Greenhouse Gas Impact Analysis, City of Tustin, prepared by MAT Engineering, Inc., dated May 19, 2026
- C. Phase I and II Environmental Site Assessment (ESA), 17332 Irvine Boulevard, Tustin, California; prepared by Stantec Consulting Services, Inc.; November 13, 2025
- D. South Central Coastal Information Center Records Search, May 29, 2026
- E. Preliminary Geotechnical Investigation, 17332 Irvine Boulevard, Tustin, California; prepared by Albus Associates, November 20, 2025.
- F. Preliminary Water Quality Plan (WQMP), Project: TOC-17332 Irvine Boulevard, Tustin, CA: prepared by Advanced Civil Group, Inc, dated April 27, 2026.
- G. 17332 Irvine Boulevard Residential Project Noise Impact Analysis; prepared by MAT Engineering, Inc., May 19, 2026
- H. 17332 Irvine Boulevard Residential Project Trip Generation & VMT Analysis/Screening, City of Tustin; prepared by MAT Engineering Group Inc., May 19, 2026
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SECTION 1.0 – INTRODUCTION

1.1 INITIAL STUDY REQUIRED

Following preliminary review of the proposed 17332 Irvine Boulevard Residential (Project), the City of Tustin (City) has determined that the Project is subject to the California Environmental Quality Act (CEQA). This Initial Study addresses the direct, indirect, and cumulative environmental effects associated with the Project, as proposed.

1.2 STATUTORY AUTHORITY

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section (PRC) 21000-21189) and pursuant to Section 15063 of Title 14 of the California Code of Regulations (CCR).

Consistent with the statutory authority, the purpose of this Initial Study is to provide the Lead Agency (i.e., the City) with information to determine if the proposed Project would have a significant environmental impact. Specifically, this Initial Study will:

- Facilitate environmental assessment early in the design of the Project relative to site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (PRC 21003.1)
- Encourage the incorporation of environmental considerations into Project conceptualization, design, and planning at the earliest feasible time. (CEQA Guidelines Section 15004[b][3])
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City and applicant to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (CEQA Guidelines Section 15126.4)
- Provide the City with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or Negative Declaration.

This environmental document and supporting analysis will be distributed for public review. Any comments received during the review period and the City's responses to those comments will be included in the City's environmental review of the Project.

1.3 INCORPORATION BY REFERENCE

The information contained in this document is based, in part, on the following documents that include the Project site or provide information addressing the general project area or use:

- **City of Tustin General Plan** (November 2018). The Tustin General Plan (General Plan) is the principal long-range policy and planning document guiding the development, conservation, and enhancement of Tustin. It contains a comprehensive collection of goals and policies related to the physical development of the City. The General Plan includes the following elements: Land Use; Housing (updated October 2022); Circulation; Conservation, Open Space, and Recreation Element (C/OS/R); Public Safety; Noise; Growth Management.

Along with the goals and policies is an implementation program geared toward carrying out these goals and policies.

- **City of Tustin Final Housing Element 2021-2029** (October 2022). The preparation of the City's Housing Element is guided by and must conform to Section 65580 et seq. of the California Government Code, which includes a requirement that the Housing Element be updated every four to eight years. The current Housing Element planning period began on October 15, 2021, and ends on October 15, 2029. The Housing Element includes the identification of goals, policies, and programs that focus on: 1) housing affordability, 2) rehabilitating substandard housing, 3) meeting the existing demand for new housing, and 4) conserving the existing affordable housing stock.
- **Tustin City Code** (current). The Tustin City Code (City Code) provides regulations for government administrative operations, construction, development, infrastructure, public safety, and business operations within the City. City Code Article 9, Chapter 2, Zoning (Zoning Code), and provides for the orderly development of land in the City.
- **California Building Code** (CBC). The California Building Standards Code (Cal. Code Regs., Title 24) was established by the State of California, with a current effective date of January 1, 2025. It incorporates all parts of the State building standards, including the Residential Code and Green Standards Code. The City of Tustin adopts the CBC as Article 8, Chapter 1, Building Codes and Construction Regulations, Chapter 1A Residential Code, and Chapter 1B Green Building Code. The City Building Division follows the CBC in its plan check and inspection processes.

SECTION 2.0 – ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

Regionally, the City of Tustin and the Project site are in the central portion of Orange County and are surrounded by the cities of Irvine to the south, Santa Ana to the west, and unincorporated Orange County to the north and to the east. Major freeways providing access to the Project site are Interstate 5 (I-5), State Route (SR) 55, and SR 261. (Reference Figure 1. *Project Regional Location Map*, below.)

Locally, the Project site is addressed as 17332 Irvine Boulevard, Tustin, California 92780. It is bounded on the north by Irvine Boulevard, to the east by Mountain View Drive, on the south by commercial and residential uses, and on the west by Yorba Street. The Assessor's Parcel Number for the property is 401-512-01. (Reference Figure 2. *Project Site Aerial Location Map*).

2.2 GENERAL PLAN DESIGNATION

The General Plan Land Use Map designation for the Project site is Professional Office (PO). The General Plan Land Use Element (Land Use Element) states that the Professional Office designation provides areas of development of primarily professional offices and other supporting uses. Permitted uses include professional, legal, medical, general financial, administrative, corporate and general offices, business support services, financial, insurance and real estate services and supportive commercial uses such as restaurants, medical services, public service uses, financial institution, cultural and public/institutional facilities, and similar uses which together constitute concentrations of office employment or community activity.¹

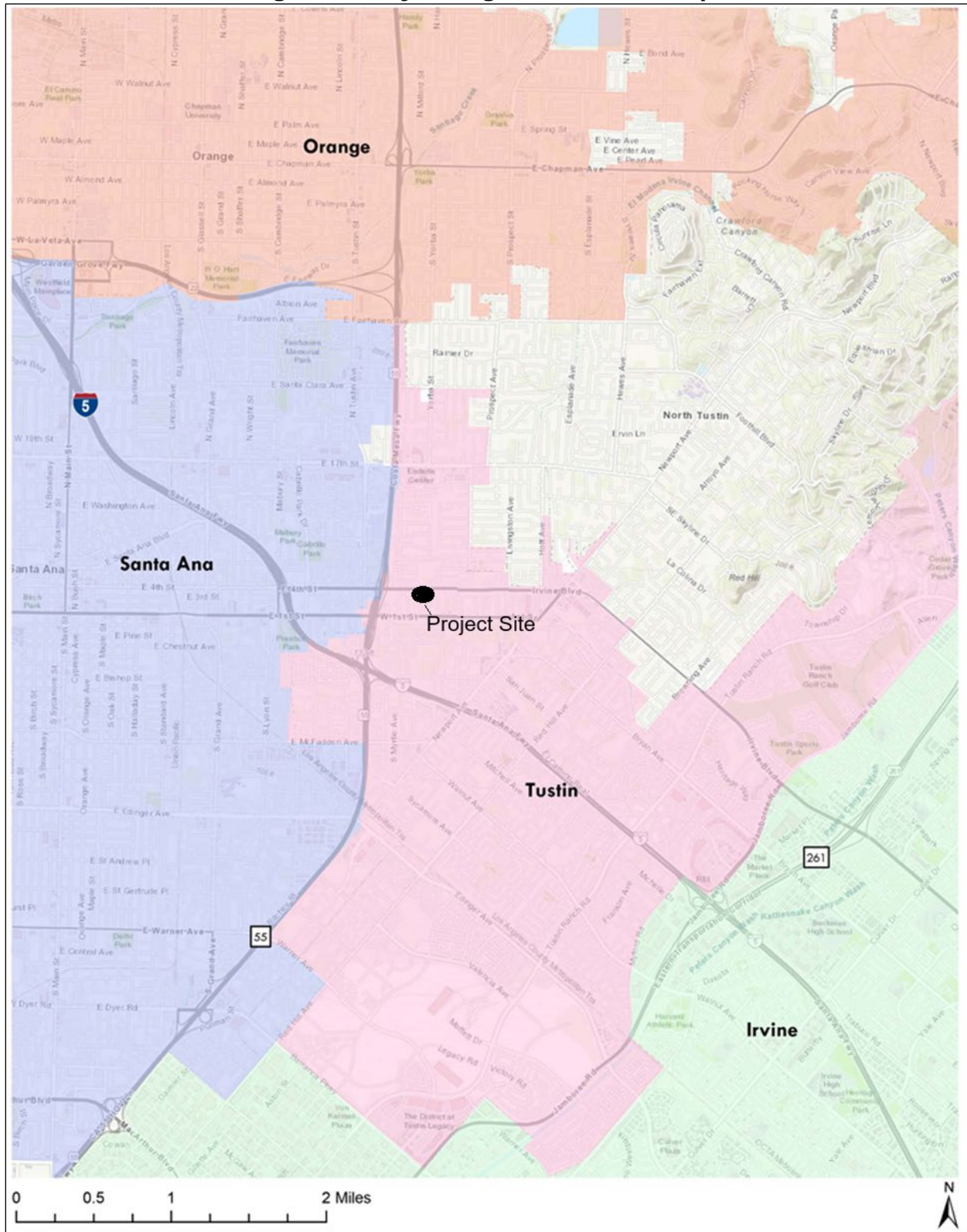
2.3 ZONING

Zoning Map designation for the Project site is Professional (PR). Tustin City Code Section 9231 provides land use regulations for the PR zone, allowing for a variety of professional office and service uses, and single-family dwellings and use subject to the requirements of the R1 District.

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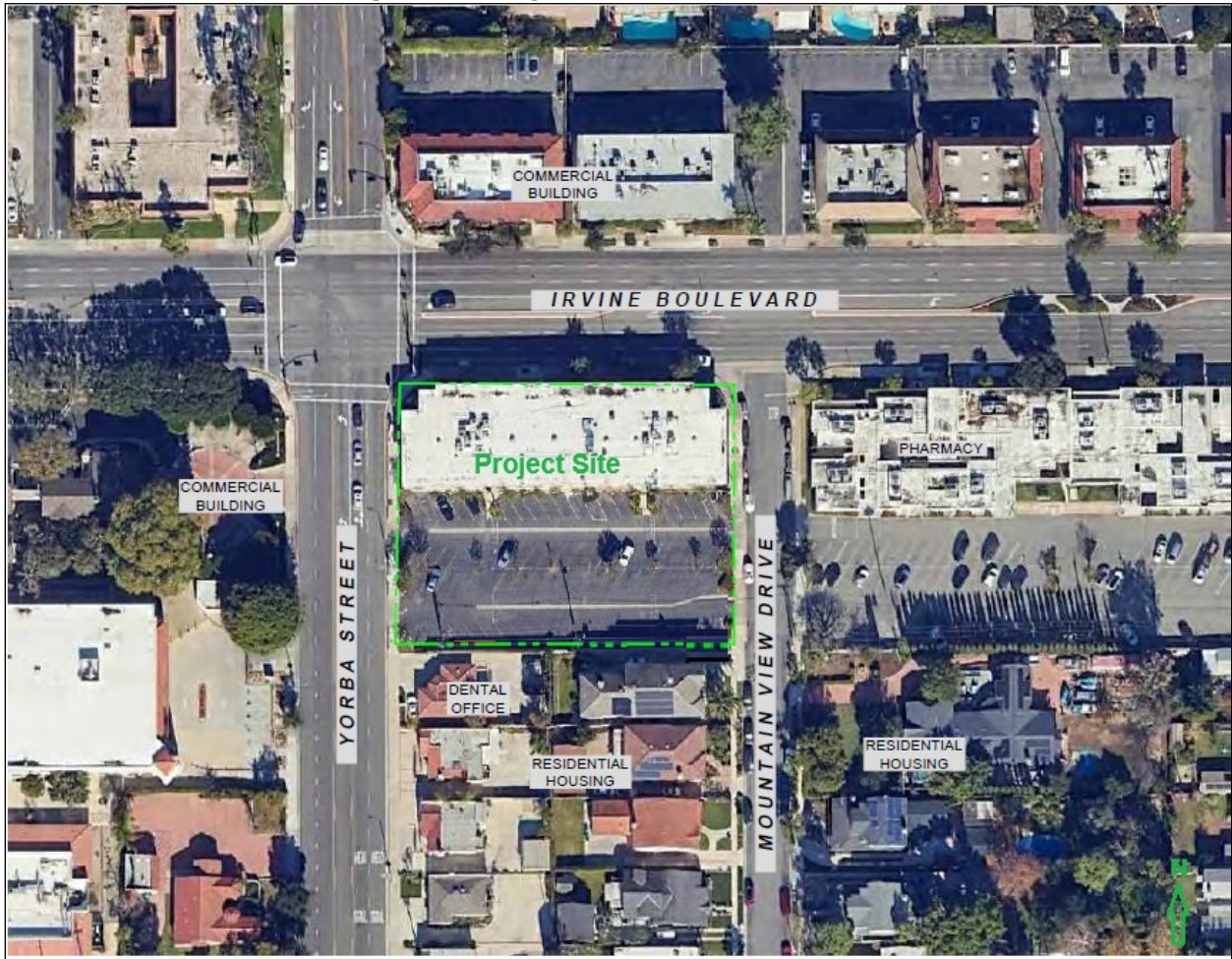
¹ Land Use Element, page 42.

Figure 1. Project Regional Location Map



(source: Google Earth.)

Figure 2. Project Site Aerial Location



(source: Stantec Inc.)

2.4 EXISTING SITE AND SURROUNDING LAND USES

2.4.1 EXISTING SITE LAND USES

Current uses on the Project site consist of a 24,287-square foot two-story multi-tenant commercial/office building, with an existing height of 23.5 feet. A 13,427-square foot asphalt parking lot is located behind the building. (Reference Figures 3-5, *Photos of Existing Building*, below.) A scattering of ornamental vegetation borders the building and parking lot, which include small and medium sized trees of the *Pyrus calleryana* (Callery Pear), *Quercus virginiana* (Southern Live Oak), *Platanus racemosa* (California Sycamore), and *Phoenix roebelenii* (Pygmy Date Palms) species.

Figure 3. Photo of Existing Building, North Elevation From Irvine Boulevard



(source: Google Maps)

Figure 4. Photo of Existing Building, East Elevation From Yorba Street



(source: Google Maps)

Figure 5. Photo of Existing Building, West Elevation From Mountain View Drive



(source: Google Maps)

EXISTING SITE TOPOGRAPHY

The site has an elevation of approximately 147 feet above mean sea level (amsl), and a slight (approximately 0.3%) southerly gradient.

EXISTING SITE EASEMENTS

There are also four existing Southern California Edison (SCE) easements on the Project site. Three of the existing easements run along the southern edge of the site and contain two 38' tall utility poles as well as underground lines and conduits that serve properties located south of the Project site. There is an additional SCE easement that runs along the central portion of the site under the existing parking lot; this easement would be quitclaimed and removed as it serves the existing commercial/office building.

HISTORICAL PROJECT SITE LAND USES

Historical use of the site, dating back at least to 1938, consisted of agricultural cultivation (i.e., row crops).² By 1966, the site was cleared and stood as graded vacant land until the existing commercial/office building and parking lot were constructed in 1972. Since then, the Project site has remained relatively unchanged.

2.4.2 EXISTING SURROUNDING LAND USES

Existing land uses that surround the Project site are shown on Figure 2, Project Site Aerial Location, and in Figures 6, 7 and 8, *Surrounding Site Photos*; and are identified below:

- North: Irvine Boulevard, two-story commercial buildings, and single-family residential units;
- East: Mountain View Drive, a pharmacy and single-family units;
- South: Single-family residential unit immediately adjacent to the site's southern boundary. Additional residential office uses to the south along both Mountain View Drive and Yorba Street;
- West: Yorba Street, Health South Tustin Rehabilitation, offices and single-family residential units.

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² Phase I and II Environmental Site Assessment (ESA), 17332 Irvine Boulevard, Tustin, California; prepared by Stantec Consulting Services, Inc.; November 13, 2025; page 10. (Appendix C)

Figure 6. Surrounding Site Photo – Looking North Across Irvine Boulevard



(source: Google Maps)

Figure 7. Surrounding Site Photo – Looking East Along Mountain View Drive



(source: Google Maps)

Figure 8. Surrounding Site Photo – Looking West Along Yorba Street



(source: Google Maps)

HISTORICAL USE OF SURROUNDING PROPERTIES

Similar to the Project site, surrounding uses to the north, east and west were previously agriculture. Residential uses were located south of the site, dating back to at least 1938.³ Commercial development was established to the north, east and west of the site beginning in 1966. Between 1966 and 1985, commercial development continued, with additional residential to the south. Since 1985, the surrounding properties have remained relatively unchanged.

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³ Phase I and II Environmental Site Assessment (ESA), 17332 Irvine Boulevard, Tustin, California; prepared by Stantec Engineers; November 13, 2025; page 10; historical land uses based on available building records and historical aerial photos. (Appendix C)

2.5 CUMULATIVE PROJECTS

City of Tustin Community Development Department reports the following active development projects, listed by name, location, brief description, status and proximity to the Project site.⁴ (Reference Table 1, *Cumulative Projects List by Project, Location and Status, below.*) All of the proposed or pending developments are infill projects consisting of residential, commercial, institutional or industrial uses, and all are located a distance of 0.6 to 4.0 miles from the Project site. Because of the distance of these developments from the Project site, they are not expected to contribute to any potential cumulative impacts associated with Project construction or operation.

Table 1. Cumulative Projects List by Project, Location and Status				
City Listed Current Development Projects	Location	Brief Description	Status	Proximity to Project Site
Campo on 17th - Enderle Center Redevelopment	East 17 Street & Enderle Center Drive	Mixed-use shopping center with 100 residential units	Entitlements approved	1.2 miles north
Cypress Grove Residential Project	17th Street & Prospect Avenue	145 residential units.	Entitlements approved	1.5 miles north
Irvine Company at Tustin Legacy	Warner Avenue & Compass Avenue	1,336 residential units	Under construction	4 miles south
Residences at The District	2237 Park Avenue	800 residential units	Entitlements under review	4 miles south
Mariner's Church	Warner Avenue & Veterans Way	33,000 square-foot church	Entitlements approved	3.5 miles south
Costco Warehouse Expansion	2560 & 2655 El Camino Real	9,385 square foot expansion	Under construction	2.8 miles east
Clearwater Living at Tustin Legacy	Warner Avenue & Armstrong Avenue	270 units for age-restricted active adult residents	Entitlements approved	3.4 miles south
Popeye's Louisiana Kitchen	14982 Prospect Avenue	1,413 square foot drive-thru restaurant	Under plan check	0.6 miles east

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⁴ [Current Projects | Tustin, CA](#); accessed July 7, 2026.

Table 1. Cumulative Projects List by Project, Location and Status				
City Listed Current Development Projects	Location	Brief Description	Status	Proximity to Project Site
Compass at Red Hill	13751 & 13841 Red Hill Avenue	73 residential units	Under construction	2 miles southeast
Platform Tustin Project	Red Hill Avenue & Victory Road	Two industrial buildings, totaling 142,924 square feet	Entitlement approved	3 miles south
KB Home	14042 Newport Avenue	42 residential units	First phase complete, second phase under construction	1.2 miles south
Panattoni Industrial Warehouse	14321 & 14351 Myford Road	148,437 square foot industrial facility	Entitled	4 miles southeast
Advantech North American Campus	Red Hill Avenue & Victory Road	Office building and warehouse facility	Under construction	3 miles south
Bonita Townhomes	1052 Bonita Street	4 residential units	Entitlement approved	1.5 miles southeast
Taqueria Hoy	14232 Newport Avenue	1,390 square foot drive-thru restaurant	In plan check	1.35 miles southeast
2441 Michelle Industrial Buildings	2441 Michelle Drive	Two industrial buildings, totaling 180,813 square foot	Entitlement review	4 miles southeast
16801 McFadden Avenue 7-11 Convenience Store	16801 McFadden Avenue	Replacement of an existing convenience store with new 4,212 square foot 7-11 convenience store with a six island/twelve pump service station	Under construction	1.5 miles southwest

SECTION 3.0 – PROJECT DESCRIPTION

3.1 PROJECT TITLE

17332 Irvine Boulevard Residential Project.

3.2 LEAD AGENCY NAME AND ADDRESS

City of Tustin
Planning Division
300 Centennial Way
Tustin, CA 92780.

3.3 CONTACT PERSON AND PHONE NUMBER

Jose Jara, Associate Planner
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300 Centennial Way, Tustin, CA 92780
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Raymond Barragan, Principal Planner
Planning Division
Community Development Department
300 Centennial Way, Tustin, CA 92780
Phone: 714-573-3016
Email: RBarragan@tustinca.org

3.4 PROJECT SPONSOR'S NAME AND ADDRESS

The Olson Company
3010 Old Ranch Parkway, Suite 100
Seal Beach, CA 90740

Contact: Brian Cunningham
Director of Development
The Olson Company
3010 Old Ranch Pkwy #100
Seal Beach, CA 90740
Direct: 949-244-5672
Email: bcunningham@theolsonco.com.

3.5 DESCRIPTION OF PROJECT

The Project is a 15 single-family condominium unit development on an approximately 0.996 acre site. The Project includes the demolition and removal of the existing two-story multi-tenant commercial/office building, an asphalt parking lot, and a scattering of trees and shrubs that border the building and parking lot.

Additional information regarding the proposed Project development is provided below.

3.5.1 PROJECT SITE PLAN

The proposed Project involves a small lot single-family detached residential development with a density of 15.1 units per acre. The 15 residential units would be placed on either side of a 20-foot drive aisle, with eight duplex units on the north side of the drive aisle and seven detached units on the south side. (Reference Figure 9. *Project Conceptual Site Plan*, below.) Total building lot coverage for the Project would be 29.43%.

Open Space: Each of the 15 residential units would have a private backyard, as well as side yards and a front yard area. Total open space for the Project would be approximately 10,284 square feet.

Figure 9. Project Conceptual Site Plan

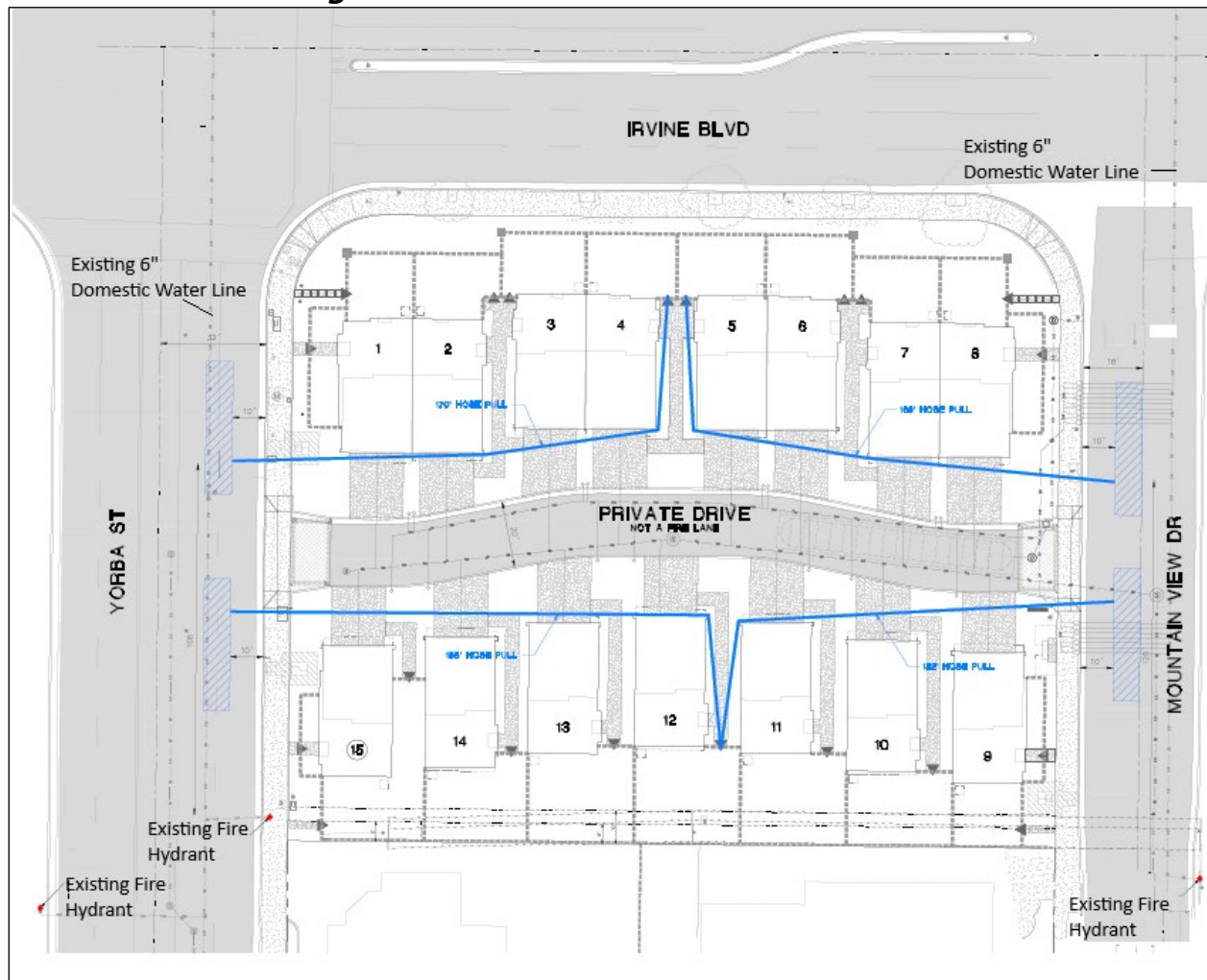


(source: The Olson Company)

Access: A 20-foot wide drive aisle that connects from both Mountain View Drive and Yorba Street would provide primary vehicle access to the site. The drive aisle would be privately owned and maintained by the Project's Homeowners' Association. Pedestrian and bicycle access for the Project also would be available from the private drive aisle, allowing Project residents direct access to the public sidewalks and streets along both Mountain View Drive and Yorba Street.

Fire access to the site would be from the 20-foot drive aisle with full vehicular access from both Mountain View Drive and Yorba Street. Orange County Fire Authority (OCFA), which provides fire protection services to the City, would use fire trucks and hose pulls to provide fire protection to the Project site. The internal street is not a fire lane and would be accessed via hose pull. (Reference Figure 10. *Fire Protection Service Plan*.)

Figure 10. Fire Protection Service Plan

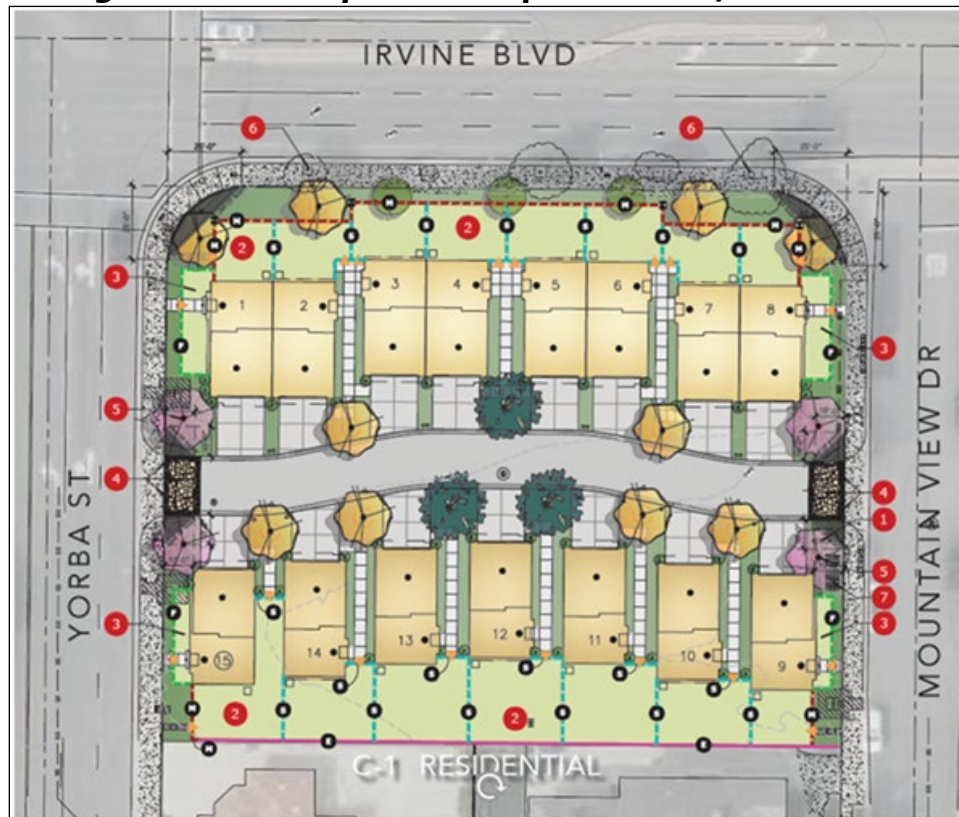


LANDSCAPE AND WALL/FENCING: Trees and shrubs would be planted throughout the site, with trees provided along the northern, western and eastern boundaries. (Reference Figure 11. *Conceptual Landscape and Wall/Fence Plan*.) Primary trees proposed for the Project would be low water use species and include: Camphor

(*Cinnamomum Camphora*), Chinese Pistache (*Pistachia Chinesis*), Fruitless Olive (*Olea Europea Wilsonii*), Saratoga Bay Laurel (*Laurus Nobilis Saratoga*). A wide variety of drought tolerant and low water use shrubs would be planted throughout the site, and low/moderate water use ground cover would be planted along the perimeter of the site, adjacent to the public sidewalk.

Fencing for the Project proposes a mix of masonry and stucco walls and vinyl fencing. Along Irvine Boulevard, a new 6-foot masonry screen wall would be provided. Along both Mountain View Drive and Yorba Street, a 4-foot stucco wall would be provided adjacent to the private drive aisle, with 6-foot vinyl fencing adjacent to the units along Mountain View Drive and Yorba Street. A 6-foot high masonry wall is proposed adjacent to the yards for these units. The existing 6-foot masonry wall along the southern edge of the Project site would remain and updated with a new wall cap.

Figure 11. Concept Landscape and Wall/Fence Plan



LEGEND	
SYMBOL	DESCRIPTION
1	PROJECT MONUMENT & SIGNAGE
2	PRIVATE BACKYARD
3	PRIVATE COURTYARD
4	ENHANCED PAVING
5	SPECIMEN TREES
6	EX. STREET TREES
7	MAILBOX CLUSTER UNITS

FENCE AND WALL LEGEND	
E	EXISTING SHARED MASONRY WALL TO REMAIN W/ NEW STUCCO CAP
M	6' HEIGHT MASONRY SCREEN WALL W/ SIDEYARD GATE, STUCCO TO MATCH ARCHITECTURE.
F	4' HEIGHT STUCCO COURTYARD WALL & GATE
S	6' HEIGHT VINYL FENCE AND SIDE YARD GATE
△	GATE

SYMBOL LEGEND	
— ■ ■ ■ —	LIMIT OF WORK
REFER TO SHEET DETAILS FOR FENCE AND WALL DETAILS.	

	CINNAMOMUM CAMPHORA CAMPHOR TREE
	PISTACHIA CHINESIS CHINESE PISTACHE
	OLEA EUROPEA 'WILSONII' FRUITLESS OLIVE
	LAURUS NOBILIS 'SARATOGA' SARATOGA BAY LAUREL
	COLUMNAR ACCENT PODOCARPUS / CUPRESSUS

(source: The Olson Company)

Parking: Each house would have four private parking spaces, two within the attached garage and two within the driveway, for a total of 60 on-site parking spaces. Table 2, *City Code Multifamily Parking / Proposed Project Parking*, below, compares the Project's proposed parking to City Code Section 9263 for Multifamily Housing. As shown in the Table, proposed Project parking would exceed the City Code requirement.

Table 2. City Code Multifamily Parking / Proposed Project Parking		
Required (Tustin City Code Section 9263)	Project Requirements Per City Code Section 9263	Project Provided
- Three-bedroom or more units: 2 spaces per unit - One (1) unassigned guest parking spaces per every four (4) units.	15 four-bedroom units = 30 parking spaces 15 unit guest parking = 4 spaces	15 four-bedroom units = 30 attached garage parking spaces 15 unit guest parking = 30 private driveway parking spaces
Total Parking Spaces	34	60

3.5.2 PROJECT ARCHITECTURE

Each of the Project's 15 residential units would be three stories, with a maximum height of 39 feet. Each of the seven detached units would be 2,017 square feet (s.f.), with 4 bedrooms, 3.5 baths and with an optional flex/den area. Each of the eight duplex units would be 2,017 s.f., with 4 bedrooms, 3.5 baths and an optional flex/den area.

Architectural style for all the units would be Spanish, with tile roofs, wood trim and stucco walls of tan and off-white hues. (Reference Figure 12. *Conceptual Project*

Architecture – Detached Residential; and Figure 13. Conceptual Project Architecture – Duplex Residential, below.)

Figure 12. Conceptual Architecture – Detached Residential



(source: The Olson Company)

Figure 13. Conceptual Architecture – Duplex Residential



(source: The Olson Company)

3.5.3 PROJECT ENERGY FEATURES

As required by CBC Title 24 standards, including Green Building Code requirements, the Project would be fully electric and would install in each unit energy efficient appliances and light fixtures, low water use plumbing, drip irrigation, energy efficient electrical circuits and solar photovoltaic panels.

3.5.4 Project Offsite Improvements

The Project would include the following offsite improvements necessary to connect the proposed residential units to adjacent roadways and public utilities: two new driveways, water connections for each unit with meters in the public right-of-way, sewer main connection, and storm drain conduit running under the public sidewalk along Mountain View Drive. In addition, the Project would include two ADA accessible crossings, one on the corner of Irvine Boulevard & Yorba Street adjacent to the Project site, and the other on Irvine Boulevard & Mountain View Drive adjacent to the site.

3.5.5 PROJECT GRADING AND DEMOLITION

Grading for the Project is expected to remove an estimated 3-4 feet of artificial fill which would be replaced as engineered compacted fill. Total estimated soil to be removed and refilled is 1,800 cubic yards; no soil export is expected. Finished grade for the Project would be substantially similar to existing grade, and no significant grading issues are expected.⁵

The Project would include demolition and removal of the existing on site two-story commercial/office building and parking lot. Demolition waste quantities are estimated to include 43,763 square feet of building and asphalt paving material.⁶

3.5.6 PROJECT CONSTRUCTION SCHEDULE

Project construction is expected to occur over an approximately 13-month period, beginning in May 2027 and ending in August 2028. Table 3, *Expected Project Construction Schedule*, below, depicts the anticipated Project construction by major construction phase:

Table 3. Expected Project Construction Schedule		
Construction Phase	Expected Start Date	Expected Completion Date
Demolition	5/20/2027	6/24/2027
Site Grading	6/28/2027	7/13/2027

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⁵ Preliminary Due Diligence Report: 17332 Irvine Blvd, Tustin, California; prepared by Advanced Civil Group, Inc., dated December 1, 2025; contained as Appendix A to this Initial Study.

⁶ 17332 Irvine Boulevard Residential Project Air Quality & Greenhouse Gas (GHG) Impact Analysis, City of Tustin, prepared by MAT Engineering, Inc. (Air Quality Impact Study) and contained as Appendix B to this Initial Study.

Table 3. Expected Project Construction Schedule		
Construction Phase	Expected Start Date	Expected Completion Date
Utility Installation	5/24/2027	9/2/2027
Paving	9/7/2027	9/20/2027
Site Completion/Permanent Power	9/21/2027	11/8/2027
Model Construction	10/7/2027	3/20/2028
Project Construction	3/23/2028	8/7/2028

3.5.7 PROJECT ENTITLEMENTS

The Project would require the following entitlements from the City of Tustin:

- General Plan Amendment (GPA) 2026-0001 – Amend the site’s land use designation from Professional Office (PO) to Planned Community Residential (PC RES).
- Zone Change (ZC) 2026-0001 – Amend the site’s zoning designation from Professional District (PR) to Planned Community Residential (PC), which would include adoption of development standards for the proposed residential development consistent with the underlying PC RES land use designation.
- Subdivision (SUB) 2026-0006 / Vesting Tentative Tract Map (VTTM) No. 19483 – Subdivide the existing 0.99-acre parcel into one development parcel for condominium purposes.
- Design Review (DR) 2026-0004 – Review and approval of the proposed site plan, architecture, landscaping, and related site improvements.

3.5.8 PLANNED COMMUNITY PLAN REGULATIONS

The Project’s Planned Community Plan would contain the following development regulations:

- Gross Acres: 0.996 acres
- Gross Density: 15.1 du/ac
- Lot Coverage: 45%
- Setback - Front to Irvine Boulevard: 20’
- Setback - Side to Mountain View Drive: 9’
- Setback - Side to Yorba Street: 9’
- Setback - Rear to existing single-family development: 18’
- Between onsite Project buildings: Subject to California Building Code
- Maximum Building Height: Three stories, 39 feet, with the height of livable/occupied space not to exceed 37 feet, and the maximum overall building height, including roofs and parapets, not to exceed 39 feet.
- Parking: Guest parking in private drives (2 per unit, 30 total)
- Unit Parking: Enclosed private garages (2 per unit, 30 total).

SECTION 4.0 – ENVIRONMENTAL CHECKLIST

Project Title: 17332 Irvine Boulevard Residential Project (Project).

Brief Project Description: The Project proposes to demolish and remove an existing commercial/office building, and develop 15 single-family condominium units on an approximately 0.996 acre (43,374 square feet) site. The Project includes the following discretionary actions required to facilitate the proposed development are as follows:

- General Plan Amendment (GPA) 2026-0001 – Amend the site’s land use designation from Professional Office (PO) to Planned Community Residential (PC RES).
- Zone Change (ZC) 2026-0001 – Amend the site’s zoning designation from Professional District (PR) to Planned Community Residential (PC), which would include adoption of development standards for the proposed residential development consistent with the underlying PC RES land use designation.
- Subdivision (SUB) 2026-0006 / Vesting Tentative Tract Map (VTTM) No. 19483 – Subdivide the existing 0.99-acre parcel into one development parcel for condominium purposes.
- Design Review (DR) 2026-0004 – Review and approval of the proposed site plan, architecture, landscaping, and related site improvements.

Project Location (Address): 17332 Irvine Boulevard, Tustin, California 92780

Project Site Assessor’s Parcel Number: 401-512-01.

Project Proponent: The Olson Company, 3010 Old Ranch Parkway, Suite 100 Seal Beach, CA 90740.

Cortese List: The Project does not involve a site located on the Cortese list, pursuant to Government Code Section 65962.5(a)(1).

Other Public Agencies Whose Approval is Required: None.

California Native American Tribes Traditionally and Culturally Affiliated with the Project Area: *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, has consultation begun?*

Section 21080.3.1 of the Public Resources Code (PRC) is the legislative enactment of Assembly Bill (AB) 52 that states that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their cultural resources. This legislation requires the lead agency to provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, and invite them to provide consultation on tribal cultural resources.

Because the Project includes a General Plan Amendment, the Project must also follow the Senate Bill (SB) 18 tribal resource consultation process. The City has provided the consultation notices for the Project as required by both the AB 52 and SB 18 tribal consultation processes on April 6, 2026. Tribal consultation was requested by representatives of four tribes. The consultation process and potential Project impacts to tribal resources and recommended mitigation measures are discussed in Section 5.18 of this Initial Study.

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact. However, for each factor checked, mitigation is recommended that would reduce the impact to "Less than Significant with Mitigation Incorporated," as indicated by the checklist on the following pages.

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

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

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

Date

4.3 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the Project falls outside a fault rupture zone.) A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning

ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

SECTION 5.0 – ANALYSIS OF ENVIRONMENTAL IMPACTS

The following section analyzes the Project according to the environmental topics contained in Appendix G of the CEQA Guidelines. For each environmental topic, the thresholds of significance are presented in tabular form, and the finding relative to each threshold is checked.

To establish the baseline for the analysis, the regulatory setting and existing physical setting for each topic are described. An analysis corresponding to each finding is then provided along with applicable mitigation requirements.

5.1 AESTHETICS

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

5.1.1 ENVIRONMENTAL SETTING

5.1.1.1 Regulatory Setting

Potential aesthetic impacts of the Project are reviewed within the context of the following regulatory setting:

City of Tustin General Plan: The City of Tustin General Plan Conservation, Open Space, and Recreation Element (C/OS/R Element) contains the following statement regarding scenic resources applicable to the Project:

Scenic Resources: As new development is considered by City decision makers, public views should be preserved as much as possible. Consideration will be given to protecting public views along the ridge lines, views toward the inland mountains and along scenic transportation corridors. Figure COSR-4 conceptually identifies significant public scenic resources in Tustin.

5.1.1.2 Existing Conditions

As previously discussed in Section 2.4, the Project site currently contains a two-story commercial/office building, a paved parking lot and ornamental landscaping. Adjacent uses include commercial to the north, east and west of the site, and residential to the south.

Existing light sources in the vicinity of the Project site include exterior lighting from surrounding properties and streetlights along Irvine Boulevard, Yorba Street and Mountain View Drive. The existing light sensitive receptors are residents of the existing single-family units which have side yards that abut the Project site's southern boundary.

5.1.2 Analysis of Environmental Impacts

a) Would the Project have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is generally defined as a publicly accessible viewpoint that provides expansive views of a highly valued landscape.⁷ To be designated a public scenic vista, formal action by a governmental agency having jurisdiction over the view, place or setting is required. The City General Plan does not contain a specific policy regarding scenic vistas, but does contain the statement regarding scenic resources noted above.

Irvine Boulevard, which fronts the Project site, is one of the arterials indicated on General Plan Scenic Resources Figure COSR-4 and recommended as a landscape corridor. Existing City street trees are in place along Irvine Boulevard in front of the Project site. These trees would remain, and the Project proposes to install trees and landscaping within the site's front setback consistent with the proposed conceptual landscape plan (Figure 11, *Project Conceptual Landscape and Wall/Fence Plan*). The Project would not have a substantial adverse effect on a scenic vista.

b) Would the Project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

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⁷ [Scenic Vista Definition | Law Insider](#)

No Impact. State scenic highways are classified by the California Department of Transportation's (Caltrans) Landscape Architecture Program as either Officially Listed or Eligible. Caltrans defines a scenic highway as any freeway, highway, road, or other public ROW that transverses an area of exceptional scenic quality.⁸ There are no designated scenic highways in the City of Tustin. The Project would not damage scenic resources 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 points). 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 in an urbanized area of Tustin, surrounded by commercial and residential uses. Because of its urbanized location, the applicable aesthetic significance threshold for the Project is: "Would the project conflict with applicable zoning and other regulations governing scenic quality?"

The Project site is along Irvine Boulevard and is currently developed with an existing two-story commercial/office building. As discussed below, in Section 5.5.1 of this Initial Study, the existing commercial/office building onsite is not included in the recent City historic resources survey, nor has it been noted by the City as possessing any scenic or special aesthetic quality. The Project would replace the existing commercial/office building with 15 units consisting of a Spanish themed architecture, similar to residential structures included in the City's Cultural Resources District, and consistent with General Plan C/OS/R Goal 12 and Policy 12.3 which encourage architectural design compatible with nearby historic structures. Landscaping for the Project would consist of trees and shrubs throughout the site, with trees provided along the northern, western and eastern boundaries.

Although the Project would change the visual character of the site, the proposal would redevelop the site with a cohesively designed single-family residential community. The single-family character of the Project would be compatible to existing single-family residents to the south. In addition, as discussed previously in Section 3.5 and illustrated in Figure 11 (*Conceptual Landscape and Wall/Fence Plan*), the Project proposes to enhance the existing 6-foot wall and install trees that would reduce visual impacts to existing single-family residents to the south. The Project's final wall design and landscaping plan would be subject to City Planning Division review and approval.

2.8.1 PROJECT SITE PLAN

Further, upon the City's review and approval of the Project's proposed rezoning, the Project would not conflict with the applicable zoning. Project impacts relative

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⁸ [Scenic Highways | Caltrans](#); accessed June 20, 2026.

to conflicts with applicable zoning or other regulations governing scenic quality regulations would be less than significant.

- d) *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. The Project would replace an existing commercial/office building with 15 units. Each of the proposed units would have exterior wall mounted lights. Pole mounted lights, 16' tall, would be located along the private drive aisle. These proposed lights would provide nighttime lighting for safety and security purposes. City Code Section 8102 regulates exterior lighting. A photometric plan has been prepared for the Project, demonstrating that all outdoor lighting would be hooded, appropriately angled away from adjacent land uses, and in compliance with City Code requirements.⁹

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. As discussed in Section 3.5, the Project structures would be constructed with stucco and wood walls and tile roofs. These materials are not reflective and would not create glare. Project impacts relative to a new source of substantial light or glare that would adversely affect day or nighttime views in the area would be less than significant.

5.1.3 MITIGATION MEASURES

The analysis determined that the proposed Project would result in no or less than significant adverse impacts regarding aesthetics. No mitigation is required.

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⁹ The Project photometric plan is available for review at City of Tustin Planning Services office.

5.2 AGRICULTURAL AND FOREST RESOURCES

AGRICULTURAL/FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Project (as defined by Government Code Section 51104(g))?				X
d) Result in loss of forest land or conversion of forest land to non-forest use?				X
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?				X

5.2.1 ENVIRONMENTAL SETTING

5.2.1.1 Regulatory Setting

Potential agricultural and forest resources impacts of the Project are reviewed within the context of the following regulatory setting:

State Farmlands Map: The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) prepares, updates, and maintains Important Farmland Series Maps (Maps) as defined in subdivision (f) of Section 65560 of the Government Code, and prepares and maintains an automated map and database system to record and report changes in the use of agricultural lands every two years on even numbered calendar years. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland.

City of Tustin General Plan: The City of Tustin General Plan C/OS/R Element includes Goal 9 regarding agricultural resources: Manage the production of economically valuable agricultural resources to achieve a balance between current market forces and long-term community values. Neither the Project site nor surrounding areas contain existing agricultural resources or uses. Therefore, there are no General Plan agricultural resource goals or policies applicable to the Project.

5.2.1.2 Existing Conditions

Between at least 1938 and 1966, the Project site was used for agriculture. Surrounding properties were similarly used for agriculture up to the early 1970s. Currently, the Project site and surrounding areas are fully urbanized with commercial and residential land uses.

5.2.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance?*

No Impact. Tustin is primarily an urban environment with no or limited agricultural land under commercial cultivation. Although the Project site was used for agricultural purposes, no agricultural uses remain on the site or surrounding areas. The California Department of Conservation Farmlands Map classifies the Project site and its surrounding areas as "Urban and Built-Up Land."¹⁰ The Project would not convert farmland to a non-agricultural use.

- b) *Would the Project conflict with existing zoning for agricultural use or a Williamson Act Contract?*

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¹⁰<https://maps.conservation.ca.gov/dlrp/ciff/>; accessed April 9, 2026.

No Impact. Existing zoning for the Project site is Professional. Surrounding properties are designated Professional, Single-family Residential and Multiple Family Residential.

The Williamson Act (Cal. Govt. Code, §51200 et seq.) allows county governments to enter into contracts with private landowners who agree to restrict parcels of land to agricultural uses or uses compatible with agriculture for at least ten years. In return, landowners receive property tax assessments that are much lower than normal because they are based upon income derived from farming and open space uses as opposed to full market value of the property. There are no lands within the City currently under Williamson Act contracts.

The Project would not conflict with an agricultural zoning or Williamson Act contract.

- c) *Would the Project conflict with existing zoning for or cause rezoning of, forest land?*

No Impact. The Tustin General Plan Land Use Plan does not contain a forest land use designation, and the General Plan does not contain policies specific to forest land. Similarly, the City Zoning Map does not contain a forest land designation, and the City Code does not contain policies specific to forest uses. The City, inclusive of the Project site, is developed with urban land uses. The Project would not conflict with zoning for forest land.

- d) *Would the Project result in the loss of forest land or the conversion of forest land to a non-forest use?*

No Impact. There are no forest lands in the City. The Project would not result in the loss or conversion of forest land.

- e) *Would the Project involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use?*

No Impact. As discussed previously, the City, inclusive of the Project site, is developed with urban land uses. There are no exclusive farmlands or forests in the City. The Project would not result in the loss or conversion of farmland or forest land.

5.2.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on agricultural and or forest resources. As a result, no mitigation is required.

5.3 AIR QUALITY

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:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

5.3.1 ENVIRONMENTAL SETTING

5.3.1.1 Regulatory Setting

Potential air quality impacts of the Project are reviewed within the context of the following regulatory setting:

Federal/State Clean Air Standards: This act requires the United State Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for criteria pollutants considered harmful to public health and the environment. The State of California has also established additional and more stringent California Ambient Air Quality Standards (CAAQS) in addition to the seven criteria pollutants designated by the federal government: (Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂), Ozone (O₃), Particulate Matter (PM₁₀ and PM_{2.5}), and Lead (Pb).) AAQS are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Regional South Coast Air Quality Management District (SCAQMD): The SCAQMD is one of California's 35 air quality management districts that have prepared Air Quality Management Plans (AQMP) to accomplish a five percent annual reduction in air emissions. SCAQMD adopted the 2022 AQMP on December 2, 2022. The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 eight-hour ozone NAAQS – 70 parts per billion

(ppb) as expeditiously as practicable. The 2022 AQMP incorporates the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), which includes strategies to reach the regional target of reducing GHGs from autos and light-duty trucks.

To support attainment of the state and federal standards, SCAQMD establishes a program of rules and regulations for the construction and operation of development projects. Several of the rules and regulations that may be applicable to this project include, but are not limited to, the following:

- SCAQMD Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- SCAQMD Rule 403 governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.
- SCAQMD Rule 1113 governs the sale, use, and manufacturing of architectural coating and limits the volatile organic compound (VOC) content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of the project must comply with Rule 1113.
- SCAG 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS, adopted September 3, 2020, includes performance goals that were adopted to help focus future investments on the best-performing Projects, as well as four strategies to preserve, maintain, and optimize the performance of the existing transportation system. These strategies include: Build and maintain an integrated multimodal transportation network; Develop and connect, and sustain communities that are livable and thriving; Create a healthy regional for the people of today and tomorrow.

City of Tustin General Plan: Policies of the C/OS/R Element of the General Plan applicable to the Project and air quality include the following:

- C/OS/R Element Goal 1: Reduce air pollution through proper land use, transportation and energy use planning.
Policy 1.2: Design safe and efficient vehicular access to commercial land uses from arterial streets to ensure efficient vehicle ingress and egress.
Policy 1.3: Locate multiple family developments close to commercial areas to encourage pedestrian rather than vehicular travel.
Policy 1.4: Create the maximum possible opportunities for bicycles as an

alternative transportation mode and recreational use.

- C/OS/R Element Goal 3: Reduce particulate emissions to the greatest extent feasible.

5.3.1.2 Existing Conditions

The Project site is located in the City of Tustin which is part of the South Coast Air Basin (SCAB) that includes the urban portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The South Coast Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the South Coast Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

Criteria Air Pollutants: Criteria air pollutants that impact the region inclusive of the Project site, are defined as those pollutants for which the federal and State governments have established air quality standards for outdoor or ambient concentrations to protect public health with a determined margin of safety. Ozone (O₃), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) are generally considered to be regional pollutants because they or their precursors affect air quality on a regional scale. Ozone is formed when volatile organic compounds (VOCs) react with nitrogen oxides in the presence of sunlight. VOC is classified as a precursor pollutant and only regional emission thresholds have been established for VOC. Pollutants such as carbon monoxide (CO), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂) are considered to be local pollutants because they tend to accumulate in the air locally. Particular Matter is also considered a local pollutant. Health effects commonly associated with criteria pollutants are summarized in Table 4, *Health Effects of Major Criteria Pollutants*, below.

Table 4. Health Effects of Major Criteria Pollutants		
Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	• Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. • Natural events, such as decomposition of organic matter.	• Reduced tolerance for exercise. • Impairment of mental function. • Impairment of fetal development. • Death at high levels of exposure. • Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO ₂)	• Motor vehicle exhaust. • High temperature stationary combustion. • Atmospheric reactions.	• Aggravation of respiratory illness.
Ozone (O ₃)	• Atmospheric reaction of organic gases with nitrogen oxides in sunlight.	• Aggravation of respiratory and cardiovascular diseases. • Irritation of eyes. • Impairment of cardiopulmonary function.

Table 4. Health Effects of Major Criteria Pollutants

Pollutants	Sources	Primary Effects
Lead (Pb)	Contaminated soil.	- Impairment of blood function and nerve function. - Behavioral and hearing problems in children.
Respirable Particulate Matter (PM ₁₀)	- Stationary combustion of solid fuels. - Construction activities. - Industrial processes. - Atmospheric chemical reactions.	- Reduced lung function. - Aggravation of the effects of gaseous pollutants. - Aggravation of respiratory and cardiorespiratory diseases. - Increased cough and chest discomfort.
Fine Particulate Matter (PM _{2.5})	- Fuel combustion in motor vehicles, equipment, and industrial sources. - Residential and agricultural burning. - Industrial processes. - Also, formed from photochemical reactions of other pollutants, including NO_x, sulfur oxides, and organics.	- Increases respiratory disease. - Lung damage. - Cancer and premature death.
Sulfur Dioxide (SO ₂)	- Combustion of sulfur-containing fossil fuels. - Smelting of sulfur-bearing metal ores. - Industrial processes.	- Aggravation of respiratory diseases (asthma, emphysema). - Reduced lung function. - Irritation of eyes.

Source: California Air Resources Board, 2002.

Toxic Air Contaminants: In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern that impact the region and Project area. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

Sensitive Receptors: Sensitive receptors are land uses or other types of population groups that are more sensitive to air pollution exposure. Sensitive population groups include children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For CEQA purposes, the SCAQMD considers a sensitive receptor

to be a location where a sensitive individual could remain for 24-hours or longer, such as residences, hospitals, and schools.

The nearest sensitive land uses to the Project site are residential uses located immediately to the south. There is also an existing Health South Tustin Rehabilitation Hospital located at 14851 Yorba Street, approximately 160 feet to the west of the Project site.

5.3.3 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Air Quality section is based on the "17332 Irvine Boulevard Residential Project Air Quality & Greenhouse Gas (GHG) Impact Analysis, City of Tustin," prepared by MAT Engineering, Inc., dated May 19, 2026 (Air Quality Impact Study), and contained as Appendix B to this Initial Study.

The Air Quality Impact Study uses the California Emissions Estimator Model Version 2022.1 (CalEEMod) to calculate criteria air pollutants and GHG emissions from the construction and operation of the Project. CalEEMod is a computer model published by SCAQMD for estimating pollutant emissions.

a) *Would the Project conflict with or obstruct the implementation of the applicable air quality plan?*

Less Than Significant Impact. Air pollutant emissions from the Project are expected to occur during construction and operation, and would include both mobile (vehicle) sources and stationary sources (from use of natural gas products, other consumer products, landscape equipment and architectural coatings).

Table 5, *SCAQMD Regional Significance Thresholds*, below, lists the air quality significance thresholds for the seven criteria air pollutants, which are relevant to the Project and analyzed in the Air Quality Impact Study.

Table 5. SCAQMD Regional Significance Thresholds		
Pollutant	Construction (lbs/day)*	Operation (lbs/day)
Nitrous Oxides (NO _x)	100	55
Volatile Organic Compounds (VOC)	75	55
Particulate Matter <10 µg (PM ₁₀)	150	150
Particulate Matter <2.5 µg (PM _{2.5})	55	55
Sulfur Oxides (SO _x)	150	150
Carbon Monoxide (CO)	550	550

Table 5. SCAQMD Regional Significance Thresholds		
Pollutant	Construction (lbs/day)*	Operation (lbs/day)
Lead (Pb)	3	3
*lbs = pounds		

As noted above, the SCAQMD 2022 AQMP establishes guidelines for managing air pollutants in the region, inclusive of the Project site. The 2022 AQMP utilized information and data from SCAG and its 2020-2045 RTP/SCS. According to the SCAQMD's CEQA Air Quality Handbook, projects must be analyzed for consistency with two main criteria, as discussed below.

Criterion 1: 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, and answer the question:

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

The Air Quality Impact Study provided an analysis of the Project's potential pollutant emissions relative to regional and localized pollutant concentrations associated with the CAAQS and NAAQS. As discussed under Section 5.3.3.b and c of this Initial Study below, the Project's short-term construction emissions, long-term operational emissions, and localized concentrations of CO, NOX, PM10, and PM2.5 would be less than significant. The Air Quality Impact Study also found Project construction and operational emissions to be below SCAQMD's emission thresholds. As such, the Project would not cause or contribute to regional or localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMP.

Under Criterion 1, a project air quality analysis must also answer the question:

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

The Air Quality Impact Study, as discussed under Section 5.3.3.b and c of this Initial Study, found that Project construction and operation would result in emissions that would be below the SCAQMD construction and operational thresholds. Therefore, the Project would not have the potential to cause or contribute to a violation of the ambient air quality standards.

Finally, under Criterion 1, a project air quality analysis must also answer the question:

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

As discussed below, the Air Quality Impact Study found that the Project would result in less than significant impacts with regard to localized concentrations

during project construction and operations; and as noted previously, the Project would be below SCAQMD's emission thresholds. As such, the Project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

Criterion 2: Regional air quality plans, including the 2022 AQMP, base projections for achieving air quality goals on assumptions regarding population, housing, and growth trends. This second criterion for determining project consistency focuses on whether or not the project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Under this criterion, a project air quality analysis must answer the question:

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

The 2022 AQMP is based on SCAG's 2020-2045 RTP/SCS, and SCAG uses local General Plan growth projections to calculate the 2020-2045 RTP/SCS. The Project site is designated as Professional Office (PO) in the General Plan Land Use Map and designated as Professional (PR) in the Zoning Map, which allow primarily professional offices and other supporting uses. The Project's proposed 15 residential units would not be permitted under the current PO and PR land use designations, and the Project would not be consistent with the population, housing and employment growth projections utilized in the 2022 AQMP.

As part of the Project, a General Plan Land Use Map designation change to Planned Community Residential (PC RES) and a Zoning Map designation change to Planned Community Residential (PC RES) are proposed. These proposed land use designation changes would allow for the Project's proposed 15 residential units to develop, and upon their approval, the Project would be considered consistent with the City General Plan and Zoning Map.

According to the State DOF City/County Population and Housing Estimates (1/1/2026), the City of Tustin had a total population of 79,175.¹¹ Based on the population forecast provided in 2020-2045 RTP/SCS, Tustin is estimated to have approximately 92,600 residents by 2045. As such, between 2026 and 2045, the City is expected to have an estimated population growth of 13,425 residents. The CalEEMod estimates that the Project's 15 units would result in a population increase of 45 people, which represents approximately 0.3% of anticipated growth in the City. This nominal increase would not cause the City's General Plan buildout population forecast to be notably exceeded. Similarly, this nominal 0.3% population increase would not notably alter the SCAG's regional population, housing and employment growth projections. Upon approval of the Project's proposed General Plan and Zoning amendments, it can be concluded that the Project would be consistent with the 2022 AQMP.

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¹¹ [E-1_2026_InternetVersion.xlsx](#); accessed June 9, 2026.

Under Criterion 2, a project air quality analysis must also answer the question:

Would the project implement all feasible air quality mitigation measures?

Based on the Air Quality Impact Study, as discussed under Section 5.3.2.b and c of this Initial Study below, the Project would not require mitigation and would result in less than significant air quality impacts. In addition, the Project would comply with all applicable SCAQMD rules and regulations, including Rule 403 that requires excessive fugitive dust emissions to be controlled by regular watering or other dust prevention measures, and Rule 1113 that regulates the VOC content of paint. As such, the Project meets this AQMP consistency criterion, and no mitigation is otherwise required for the Project as discussed below.

Finally, under Criterion 2, a project air quality analysis must also answer the question:

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, which encourage locating housing near transit and energy efficient construction to support sustainable growth. RTP/SCS definitions of housing near transit include both within 0.5 miles of a major transit stop and within 0.25 miles of a bus stop.¹²

Bus service in Tustin is provided by the Orange County Transportation Authority (OCTA). The OCTA bus stops closest to the Project site are located at 636 W. 1st Street, Tustin, CA (0.14 miles driving distance from the site) and at 639 W. 1st Street Tustin, CA (0.15 driving distance from the site), both of within 0.25 miles of the Project site.

Additionally, as required by the CBC Green Building Code, the new residential development would be all electric, equipped with solar energy, have dedicated branch circuits to support electric vehicle chargers, and water and energy efficient appliances. As such, the Project would be consistent with regional policies that support housing proximate to transit and energy efficient construction to support sustainable growth.

The Project would be consistent with the goals and policies of the 2022 AQMP, and the Project would not conflict with or obstruct implementation of the applicable air quality plan. The Project would also be consistent with the air quality related General Plan Goals and Policies, noted previously in Section 5.3.1, as the Project would place housing close to transit and the commercial uses on Irvine Boulevard, incorporate energy efficient features, provide vehicular, pedestrian and bicycle linkages from both Yorba Street and Mountain View Drive.

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¹² [Transit | Southern California Association of Governments](#); accessed September 16, 2025.

- b) *Would the Project 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. A violation of an air quality standard could occur over the short-term during construction, or over the long-term during the proposed Project's subsequent operation. Each is addressed below.

Construction Impacts: During construction air quality impacts may occur during demolition, site preparation, and construction activities associated with the Project. Major sources of emissions during construction include exhaust emissions, fugitive dust generated as a result of soil and material disturbance during site preparation and grading activities, and painting of the Project's structures. Construction air quality impacts are considered significant if they exceed any of the regional construction thresholds listed in Table 5, presented above. In addition, as noted previously, Project construction would be required to comply with SCAQMD Rule 403 regarding fugitive dust emissions.

Table 6, *Comparison of Projected Construction Daily Emissions to Regional SCAQMD Thresholds*, below, presents the Air Quality Impact Study calculation of daily emissions projected for site construction, and compares the emissions to the regional thresholds. The calculations apply typical construction equipment, labor, hauling materials to the site, based on its size, location and proposed timing. To assess air quality construction impacts for the Project, the Air Quality Impact Study incorporated the following assumptions into the CalEEMod Model: Construction of the Project is assumed to begin in year 2027 and last approximately 13 months. Construction phases are assumed to consist of demolition, site preparation, grading, building construction, paving and architectural coating.

As shown in Table 6, these emission levels are below their respective threshold values, and the impact would be less than significant.

Table 6. Comparison of Projected Construction Daily Emissions to Regional SCAQMD Thresholds (Pounds/day)¹						
Analysis	VOC	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Maximum Daily Emissions	2.81	8.73	9.94	0.05	2.49	1.05
SCAQMD Significance Threshold	75	100	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No
¹ Maximum daily emissions would be the same during summer or winter and include both on-site and off-site emissions. ² Construction is expected to occur over a 13-month period. The maximums shown represent the highest concentrations projected to occur during the 13-month period						

Operational Impacts: The major source of potential long-term operational air quality impacts would be from vehicle trips. Stationary sources add only minimally to these values.

Mobile Source Emissions: Mobile source emissions are the largest source of long-term air pollutants that could result from the operation of the Project. Mobile sources are direct sources of project emissions that are primarily attributed to tailpipe exhaust and road dust (tire, brake, clutch, and road surfacewear) from motor vehicles traveling to and from the site. Estimates of mobile source emissions require information on: trip generation, trip length, vehicle/fleet mix, and emission factors (quantity of emission for each mile traveled or time spent idling by each vehicle). To estimate trip generation rates, trip length and trip percentages for the Project, the Air Quality Impact Study applied the CalEEMod defaults.

Stationary Source Emissions: In addition to vehicle trips, future Project occupants would produce emissions from on-site sources including energy sources associated with equipment and chemicals used to maintain buildings and landscape.

The resultant operational emissions from mobile and stationary sources are projected by the Air Quality Impact Study for both summer and winter months, and included in Table 7, *Comparison of Projected Daily Operational Emissions to Regional SCAQMD Thresholds*, below. The proposed Project's potential operational emission levels are below their respective threshold values and the impact is less than significant.

Neither the construction nor the operation of the Project would exceed the regional SCAQMD threshold levels. In accordance with SCAQMD methodology, projects that do not exceed or can be mitigated to less than the daily threshold values do not add significantly to a cumulative impact, and consequently, this impact is less than significant.

Table 7. Comparison of Projected Daily Operational Emissions to Regional SCAQMD Thresholds (Pounds/day)¹						
Activity	VOC	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Summer						
Total Emissions	1.17	0.65	4.38	0.01	0.93	0.26
Winter						
Total Emissions	1.09	0.66	3.29	0.01	0.93	0.26
<i>SCAQMD Thresholds</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Exceeds Thresholds?	No	No	No	No	No	No

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. Use of equipment and vehicles during Project construction has the potential to create localized ambient pollutant concentrations. This could present a significant impact to sensitive receptors if these concentrations were to exceed the State or federal ambient air quality standards at receptor locations.

Localized Construction Emissions: SCAQMD establishes localized significance thresholds (LSTs) based on the ambient concentrations of applicable air pollutants for the source receptor area, which for the Project, is the Central Orange County Source Receptor Area (SRA 17), which is located approximately 7.1 miles northwest of the Project site. To measure LSTs, the Air Quality Impact Study utilized SCAQMD's significance table which measures the approximate amount of construction pollutants that reach nearby properties, and assumed a disturbance of 2.5 acres per day at a distance of 25 meters (82 feet). Table 8, *Project Localized Construction Emissions Compared to SCAQMD Construction Localized Significance Thresholds*, below, presents local emissions during Project construction and compares them to the SCAQMD LST construction thresholds. As shown in Table 8, none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors and consequently, this impact would be less than significant.

Table 8. Project Localized Construction Emissions Compared to SCAQMD Construction Localized Significance Thresholds (LST)¹				
Criteria Pollutants	NOx	CO	PM₁₀	PM_{2.5}
Maximum On-site Emissions	8.73	9.94	2.49	1.05
<i>SCAQMD Localized Significance Threshold</i>	<i>115.0</i>	<i>715.0</i>	<i>6.0</i>	<i>4.0</i>
Exceeds Threshold?	No	No	No	No
Source: SCAQMD Mass Rate Localized Significance Thresholds for 2.0-acre site in SRA-17 at 25 meters				

Localized Operational Emissions: According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project consists of a single-family residential use and does not include such uses. Due to the lack of such emissions, the Air Quality Impact Study found that no long-term localized significance thresholds analysis is necessary, and that Project operational LST impacts would be less than significant.

Toxic Air Contaminants - Construction: The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015, to provide a description of the algorithms, recommended exposure variables, cancer and noncancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. Hazard identification includes identifying all substances that are evaluated for cancer risk and/or non-cancer acute, 8-hour, and chronic health impacts. In addition, identifying any multi-pathway substances that present a cancer risk or chronic non-cancer hazard via non-inhalation routes of exposure.

The Air Quality Impact Study explains that substantial source of toxic air contaminants (TAC) emissions and corresponding individual cancer risk occur when construction is long term (i.e., 30 years). Given the short-term construction schedule for the Project, the Air Quality Impact Study finds that the Project's construction activity would have less than significant toxic air contaminant issues.

Toxic Air Contaminants – Operation: The Project would consist of residential land uses. These types of projects do not include substantial diesel particulate emissions or any other major source of TAC emissions that would result in significant exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the Air Quality Impact Study finds that the Project's operational activity would have less than significant toxic air contaminant issues.

CO Hot Spot Emissions: CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. To determine if a proposed project could cause emission levels in excess of the CO standards, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

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 maximum CO concentration at SRA 17 was measured at 2.098 ppm in 2025.¹³ Given that the background CO concentration does not currently exceed 9.0 ppm, a CO hotspot would not occur at the Project site. Therefore, no significant long-term CO impact is anticipated.

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¹³ California Air Resources Board, *Air Quality and Meteorological Information*, <https://www.arb.ca.gov/aqmis2/aqdselect.php?tab=specialrpt>, accessed May 12, 2026.

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

Less Than Significant Impact. Project construction would involve the use of heavy equipment creating exhaust pollutants from on-site earth movement and from equipment bringing concrete and other building materials to the site. Odors associated with this exhaust would be confined to the immediate vicinity of the equipment itself. By the time such emissions reach any sensitive receptor sites away from the Project site, they would be diluted to well below any level of air quality concern. Additionally, some odor would be produced from the application of asphalt, paints, and coatings. These odors would be temporary and would vary as construction equipment moves around the site. Any exposure to these common odors would be of short-term duration and, while unpleasant are not associated with a specific health hazard and are less than significant. Operational odors could be produced from on-site cooking or barbeque typical of a residential use. Because these odors are common in the environment, they would not constitute a significant impact.¹⁴

5.3.3 MITIGATION MEASURES

The analysis indicated that the construction and operation of the proposed Project would not result in any significant air quality impacts. As a result, no mitigation is required.

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¹⁴ SCAQMD CEQA Air Quality Handbook, Figure 5-4, Land Uses Associated with Odor Complaints identifies potentially significant odor impacts from such uses as agriculture (farming and livestock), a wastewater treatment plant, a food processing plant, a chemical plant, a composting facility, a refinery, a landfill, or a dairy. No significant odor impacts are identified from residential uses.

5.4 BIOLOGICAL RESOURCES

BIOLOGICAL RESOURCES. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as candidate, sensitive or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Boulevard 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling hydrological interruption, or other means?				X
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

5.4.1 ENVIRONMENTAL SETTING

5.4.1.1 Regulatory Setting

Potential biological resource impacts of the Project are reviewed within the context of the following regulatory setting:

Federal Endangered Species Act. The United States Congress passed the Federal Endangered Species Act (FESA) in 1973 to protect those species that are endangered or threatened with extinction. The FESA prohibits the taking of endangered or threatened wildlife species. A take is defined as harassing, harming (including significantly modifying or degrading habitat), pursuing, hunting, trapping, capturing, or collecting these endangered or threatened wildlife species.

Clean Water Act, Section 404. The Federal Government's Section 404 Guidelines prohibit the issuance of wetland permits for projects that would jeopardize the existence of threatened or endangered wildlife or plant species.

Migratory Bird Treaty Act (MBTA). The MBTA prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. As used in the act, the term "take" is defined as meaning, "to pursue, hunt, capture, collect, kill or attempt to pursue, hunt, shoot, capture, collect or kill, unless the context otherwise requires." With a few exceptions, most birds are considered migratory under the MBTA. Disturbances that cause nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend would be in violation of the MBTA.

California Endangered Species Act. The State of California enacted the California Endangered Species Act (CESA) in 1984. The CESA is similar to the FESA but pertains to State-listed endangered and threatened species. CESA directs agencies to consult with California Department of Fish and Wildlife (CDFW) on projects or actions that could affect listed species and directs CDFW to determine whether jeopardy would occur, and allows the Agency to identify "reasonable and prudent alternatives" to the project consistent with conserving the species.

California Fish and Wildlife Code. Section 3503 of the California Fish and Wildlife (CFW) Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Fish and Wildlife Code Section 3503.5 states specifically that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Fish and Wildlife Code Sections 3511, 4700, and 5050 provide the designation of certain fully protected birds, mammals, and reptiles/amphibians, respectively, stating that the fully protected species or parts thereof may not be taken or possessed at any time.

City of Tustin General Plan: The City of Tustin General Plan C/OS/R Element aims to conserve the City's remaining sensitive lands and to enhance the open space within the City. The most significant natural resources in Tustin include land with open space potential, lands with biological resources, water resources, prominent landforms, and those sites or structures which have historical, archaeological, or paleontological resources. These important natural resource areas are shown on Figure COSR-2, and do not show any important resources on or in the vicinity of the Project site. Therefore, there are no General Plan biological resource goals or policies applicable to the Project.

5.4.1.2 Existing Conditions

Current development on the Project site consists of a two-story multi-tenant commercial/office building, an asphalt parking lot, and a scattering of ornamental vegetation which include small and medium sized trees of the *Pyrus calleryana* (Callery Pear), *Quercus virginiana* (Southern Live Oak), *Platanus racemose* (California Sycamore), and *Phoenix roebelenii* (Pygmy Date Palms) species. None of these trees are identified as significant natural resources in the General Plan.

5.4.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project adversely impact either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

No Impact. The Project site and surrounding area are urbanized, containing buildings, paving and ornamental landscaping. Neither the site or surrounds contain natural open spaces that could support a sensitive habitat or protected plant or wildlife species. Because there are no sensitive habitat areas or identified protected species on or in the vicinity of the Project site, the Project would not result in a significant impact to any federal or state regulated sensitive habitat or species.

- b) *Would the Project have a substantial impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

No Impact. As noted above, the Project site and vicinity are disturbed and developed with urban uses. No riparian habitat or other sensitive natural community that is identified in local or regional plans, policies, regulations or by CDFW or USFWS are known to occur on the site or surrounding area. Project implementation would not result in significant adverse impacts to riparian or other sensitive natural community.

- c) *Would the Project have a substantial impact on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to,*

marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site and surrounding areas are currently developed with urban uses, with no naturally occurring water bodies. According to the USFWS National Wetlands Mapper, there no wetlands within the vicinity of the Project site.

¹⁵ The Project would not cause a substantial adverse effect on federally protected wetlands.

- d) *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?*

Less Than Significant Impact with Mitigation Incorporated. As discussed above, the Project site is surrounded by commercial and residential development, and does not contain native or sensitive species, riparian or sensitive habitats or wetlands. Vegetation on the Project site consists of a variety of small and medium trees. These trees could provide nesting habitat for year-round and seasonal birds. If Project tree removal and grading occurs during the active breeding season for birds (February 1 through September 15), the birds and their eggs could be disrupted or destroyed.

As discussed in Section 5.4.1, above, the MBTA and CFW regulations prohibit taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. To ensure nesting birds are protected during project development, Mitigation Measure BIO-1 is added to the Project, requiring compliance with MBTA and CFW regulations. The mitigation requires that prior to issuance of grading or demolition permits that include vegetation and/or tree removal activities that would occur within the active breeding season for birds (February 1 through September 15), the Project applicant (or their Construction Contractor) shall retain a qualified biologist to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. Application of this condition of approval to the Project potential impacts would be reduced to less than significant levels potential impacts associated with wildlife interference.

- e) *Would the Project conflict with any local policies or ordinances, protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. The General Plan does not identify adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local habitat conservation plans within the City. The City does continue to participate in the California Natural Community Conservation Plan for coastal sage shrub, but the Project site is not located in or near a coastal sage shrub habitat area.¹⁶ The General

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¹⁵<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>; accessed April 9, 2026.

¹⁶ General Plan C/OS/R Element PEIR, page 62.

Plan does not contain any local policies protecting biological resources, and the Project would not result in any conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

- f) *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?*

No Impact. The City does not have any adopted Habitat Conservation Plans, Natural Community Conservation Plans or other conservation plans within its boundaries. The Project would not conflict with provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

5.4.3 MITIGATION MEASURES

The following measure would be required to mitigate potential Project impacts related to nesting birds to less than significant levels:

Mitigation Measure BIO-1: Nesting Birds.

Timing: Prior to issuance of grading or demolition permits.

Department Responsible: Community Development (Planning and Building Divisions).

Prior to commencement of grading activities, the City Building Division shall verify that, in the event that vegetation and tree removal activities occur within the active breeding season for birds (February 1–September 15), the Project applicant (or their Construction Contractor) shall retain a qualified biologist (meaning a professional biologist that is familiar with local birds and their nesting behaviors) to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. The nesting survey shall include the Project site and areas immediately adjacent to the site that could potentially be affected by Project-related construction activities, such as noise, human activity, and dust, etc. If active nesting of birds is observed within 100 feet of the designated construction area prior to construction, the qualified biologist shall establish an appropriate buffer around the active nests (e.g., as much as 500 feet for raptors and 300 feet for non-raptors [subject to the recommendations of the qualified biologist]), and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

5.5 CULTURAL RESOURCES

CULTURAL AND RESOURCES. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains including those interred outside of formal cemeteries?			X	

5.5.1 ENVIRONMENTAL SETTING

5.5.1.1 Regulatory Setting

Potential cultural resource impacts of the Project are reviewed within the context of the following regulatory setting:

Federal National Historic Preservation Act of 1966 (NHPA). The NHPA declared a national policy of historic preservation to encourage the achievement of federal, state, and local preservation goals. The NHPA authorized the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer, provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assist Native American tribes in preserving their cultural heritage, and created the Advisory Council on Historic Preservation.

A property is eligible for the NRHP if it is significant under one or more of the following criteria: (1) It is associated with events that have made a significant contribution to the broad patterns of our history; (2) It is associated with the lives of persons who are significant in our past; (3) It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction; (4) It has yielded, or may be likely to yield, information important in prehistory or history.

State CEQA: Pursuant to Section 15064.5 of the CEQA Guidelines, the term "historical resources" shall include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following: (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (2) Is associated with the lives of persons important in our past; (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Section 15064.5 of the CEQA Guidelines defines "unique archaeological resources" as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

State Health and Safety Code: Section 7050.5 of the California Health and Safety Code (CHSC) requires that, if human remains (or remains that may be human) are

discovered on a project site during grading or earthmoving, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

City of Tustin General Plan: Cultural resource policies of the General Plan are contained in the C/OS/R Element, and include the following relevant to the Project:

- C/OS/R Element Goal 12: Maintain and enhance the City's unique culturally and historically significant building sites or features.

Policy 12.3: Development adjacent to a place, structure or object found to be of historic significance should be designed so that the uses permitted and the architectural design will protect the visual setting of the historical site.

- C/OS/R Goal 13: Preserve Tustin's archaeological and paleontological resources.

Policy 13.1: Require a site inspection by certified archaeologists or paleontologists for new development in designated sensitive areas.

Policy 13.2: Require mitigation measures where development will affect archaeological or paleontological resources.

5.5.1.2 Existing Conditions

Figure COSR-3, Historic Resources, of the General Plan identifies historic resources in the City. These identified resources include the Cultural Resource District, as well as several individual properties. The Cultural Resources District is located approximately 0.3 miles south of the Project site. As described in the C/OS/R Element (page 37):

The Tustin Cultural Resources District was established in response to growing concerns over future development in Old Town. The purpose of the Cultural Resources District is to provide a framework for recognizing, preserving, and protecting culturally significant structures, natural features, sites, and neighborhoods within the City of Tustin. The District includes much of the area within the original City boundaries.

A recent City historic resources survey report explored opportunities for expansion of the Cultural Resources District.¹⁷ The survey applied the federal and CEQA guidelines, outlined above, in its review of buildings, structures, sites, objects, and districts that may that possess historic, architectural or cultural significance. Properties included in the survey were located south of the Project site, along Yorba Street between Irvine Boulevard and First Street to the north and south; and along Mountain View Avenue and North C Street to the west and east, and Irvine Boulevard and First Street to the north and south.

The survey included commercial buildings constructed up 1976. Buildings evaluated under this category would be significant for their association with Tustin's commercial development, or for their association with individuals who played an important role in Tustin's history, or significant as embodiments of an architectural style, type, period, or method of construction. Historically relevant architectural styles considered in the survey include: Victorian, Italianate, Queen Anne, Craftsman, Spanish Colonial Revival, Tudor Revival, Mission Revival, Mid-Century Modern, and Ranch. The existing commercial/office building on the Project site is not associated with an important role in Tustin's history, does not have a historically relevant architectural style, and was not included in the survey.

Results of the survey recommended expanding the Cultural Resources District to include areas immediately south of the Project site along Mountain View Drive, which includes single-family units designed in the Spanish Colonial Revival style. The City is still in the process of reviewing expansion of the Cultural Resources District.

5.5.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA?

No Impact. Although the existing commercial/office building on the Project site is not included in the recent City historic resources survey, it was built in 1972, which makes it approximately 54 years. A minimum building age of 50 years is generally applied by the California Register of Historical Resources (CRHR) as one criteria for considering a building's historic significance. As outlined in Section 5.5.1, above, CEQA Guidelines Section 15064.5 criteria for defining a historic resource include one or more of the following criteria:

- 1) Listed in, or determined eligible for listing in, the CRHR;
- 2) Listed in a local register of historical resources;
- 3) A resource that is determined to be historically significant because of its represents an important aspect of California's history;
- 4) Determined to be a historical resource by the project's Lead Agency.

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¹⁷ City of Tustin Citywide Historic Resources Survey Update Report, prepared for City of Tustin, September 27, 2021.

The existing commercial /office building on the Project site and site itself do not meet any of the above listed CEQA Guidelines Section 15064.5 criteria:

- 1) Neither the building nor the site is listed in or determined by the City or other agency to be eligible CRHR;
- 2) The building is not included in the City's existing Cultural Resources District or its recent historic resources survey considering expansion of the district.
- 3) The building has been occupied by general commercial uses since it was constructed in 1972, and prior to that the site was vacant or used for agricultural purposes. There is no information to suggest that the building or site represent an important aspect of California's history.
- 4) As shown previously in 8-10, *Photos of Existing Building*, the building is a two-story masonry structure with a flat roof. It is similar to the existing commercial buildings along Irvine Boulevard. It does not demonstrate one of the historically relevant architectural styles considered in the City's recent historic resources survey. Neither the building or site have been identified by the City or other agency as historically significant for their association with Tustin's commercial development, or for their association with individuals who played an important role in Tustin's history.

Architecture for the Project is proposed to be Spanish, with tile roofs, wood trim and stucco walls of tan and off-white hues. These Spanish style elements are similar to the architectural features of Spanish Colonial Revival units located south of the Project site along Mountain View Drive and included in the City's Cultural Resources District recommended expansion district. Incorporating historically relevant architectural elements in the Project design is consistent with General Plan C/OS/R Goal 12 and Policy 12.3 that encourage architectural design compatible with nearby historic structures.

In addition, as part of this analysis, additional research regarding potential archaeological and historic resources on the Project site and its vicinity was conducted by South Central Coastal Information Center (SCCIC). As summarized in a May 29, 2026, letter from SCCIC, and contained in Appendix D of this Initial Study document, no historic resources were identified within or adjacent to the site. The Project would not result in an impact to a historical resource.

- b) *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?*

Less Than Significant With Mitigation Incorporated. From at least 1938 through 1966, the Project site and surrounding areas were occupied by agricultural row crops. The existing building on the site were constructed in the 1972. There is no evidence that the site has been previously excavated, which increases the potential for the site to contain underground archaeological resources.

As summarized in the SCCIC letter (Appendix D), no archaeological studies have been conducted in the Project area and as a result, no archaeological resources have been identified. SCCIC notes, however, that buried cultural resources could potentially be unearthed during Project grading activities. To address the

possibility of buried archaeological resources on the site, Mitigation Measure CUL-1, below, is included in the Project to establish protocols for identifying and, if applicable, protecting potential archaeological resources. This mitigation is consistent with General Plan C/OS/R Goal 13 and Policies 13.1 and 13.2, requiring an archaeological survey and mitigation if potential resources are found. With inclusion of this measure, potential impacts relative to archaeological resources would be reduced to less than significant levels.

- c) *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

Less Than Significant Impact. There is no evidence that the Project site was previously used as a cemetery. However, as discussed previously, Native Americans historically occupied the area and there is some potential for human remains to be encountered during Project excavation activities.

CEQA requires the City and any project developer to comply with the CHSC Section 7050.5 and PRC 5097 if human remains are found during excavation. As discussed in Section 5.5.1 of this Initial Study, pursuant to CHSC §7050.5-7055, should human remains be encountered during Project grading and construction activities, all construction activities must cease and the Orange County Coroner, City Community Development Department and Police Department be immediately contacted. Potential impacts related to encountering or disturbing human remains would be less than significant.

5.5.3 MITIGATION MEASURES

The following mitigation would be required to address potential discovery of unanticipated archaeological resources:

Mitigation Measure CUL-1: Unanticipated Discovery of Archaeological Resources.

Timing: During Grading.

Department Responsible: Community Development (Planning and Building and Safety Divisions).

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

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

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

5.6 ENERGY

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

5.6.1 ENVIRONMENTAL SETTING

5.6.1.1 Regulatory Setting

Potential energy impacts of the Project are reviewed within the context of the following regulatory setting:

State Energy Code: Title 24 of the State of California Building Code (CBC) establishes regulations aimed at reducing state-wide energy consumption. These regulations are adopted by the City of Tustin and apply to new development. Title 24 sections applicable to the Project include:

- Title 24 - Building Standards Code, Part 6 – California Energy Code. Title 24, Part 6 requires energy efficient appliances and fixtures, including heating/air conditioning units and lighting.
- Title 24 - Building Standards Code, Part 11 – California Green Building Code requires energy and water efficient appliances and fixtures, including double paned windows, insulation, low flow faucets, and stormwater treatment appurtenances.

City of Tustin General Plan: Energy related policies of the General Plan are contained in the existing Housing Element, and include the following that are relevant to the Project:

- Housing Element Goal 5: Ensure that new housing is sensitive to the existing natural and built environment.
Policy 5.1: Sustainable Development - Prioritize sustainable housing developments in proximity to services and employment centers thereby enabling the use of public transit, walking or bicycling and promoting an active lifestyle.

Policy 5.2: Energy Conservation - Promote green building practices for more sustainable energy conservation measures in the construction of new housing or rehabilitated units.

5.6.1.2 Existing Conditions

As discussed previously in Section 2.9, the existing building on the site was constructed in the early 1970's. The existing building is not constructed to the current Title 24 standards nor the above listed General Plan energy policies.

5.6.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. The proposed Project is an infill development, replacing an existing commercial/office building with 15 residential units built to a higher density of 15 units per acre. The Project site is connected to the existing utility infrastructure, which includes electrical and natural gas services. The Southern California Gas Company provides natural gas to the site and surrounding area; and Southern California Edison currently provides electricity services to the site and surrounding area. The Project would install new onsite electrical and natural gas infrastructure that would connect to the existing offsite lines.

Construction Energy Use: During construction of the Project, energy use would include petroleum based fuels to power construction vehicles and equipment on the project site, to transport construction workers to and from the project site, and deliveries. Electricity use during construction includes temporary power for lighting and electric equipment; and energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. These uses are typical for infill construction projects and would be limited to the estimated 13 month construction schedule.

Operational Energy Use: Higher density residential infill projects such as the Project are by their nature more energy efficient. Higher density housing provides housing for more people on less land, and infill housing links to existing infrastructure without the added energy cost of extensive roads or water and sewer lines. In addition, as a new development, the Project would be required to comply with the CBC Title 24 standards, including Green Building Code requirements for energy efficient appliances, low water use plumbing and solar. The Project would be fully electric and incorporate required energy efficient measures such as the following:

- Drip irrigation
- Low flow plumbing fixtures
- Energy efficient appliances and light fixtures
- Solar.

In addition to these energy efficient measures, future Project residents would have opportunity to walk to services and shops located on Irvine Boulevard, a commercial corridor. These aspects of the Project demonstrate consistency with Housing Element Goal 5 and Policies 5.1 and 4.2 that encourage sustainable development and energy conservation. The Project would not result in the potentially significant wasteful consumption of energy resources.

- b) *Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

No Impact. Consistent with the General Plan energy policies summarized in Section 5.6.1.1, the Project would increase residential density, and incorporate CBC Title 24 requirements that require solar, and energy and water efficient appliances and fixtures. The Project also would be consistent with 2020-2045 RTP/SCS land use strategies, including supporting transit access, residential infill and energy efficiency. The Project is located less than 0.25 miles from the two nearest bus routes, and bicycle and pedestrian access are available from the adjacent public roadways: Irvine Boulevard, Yorba Street and Mountain View Drive. The Project would be located on an infill site, and would require new single-family development to install electrical circuits and solar photovoltaic panels in accordance with the 2022 Title 24 standards and CALGreen Code¹⁸. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.6.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts relative to energy. As a result, no mitigation is required.

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¹⁸ CALGreen Code = CALGreen is California's mandatory green building standards code, designed to improve environmental performance and public health in building construction.

5.7 GEOLOGY AND SOILS

GEOLOGY AND SOILS. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not				X

GEOLOGY AND SOILS. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
available for the disposal of wastewater?				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

5.7.1 ENVIRONMENTAL SETTING

5.7.1.1 Regulatory Setting

Potential geology and soils impacts of the Project are reviewed within the context of the following regulatory setting:

State Alquist-Priolo Earthquake Fault Zoning Act: The Alquist-Priolo Special Studies Zones Act was signed into law in 1972 and renamed the Alquist Priolo Earthquake Fault Zoning Act in 1994.) The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The Act requires setbacks from State-designated active faults, and well-defined minor faults, to prevent effects to overlying or adjacent properties.

State Building Code / City Code Article 8: The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment. These regulations are adopted by the City of Tustin as City Code Article 18, and apply to new and remodel/retrofit development projects.

Regional Water Quality Control Board (RWQCB) National Pollutant Discharge Elimination System (NPDES): The City of Tustin is within RWQCB District 8, Santa Ana Region, which regulates urban stormwater runoff through the Municipal Storm Sewer System (MS4) Permit (Order No. R8-2009-0030). RWQCB Requirements include preparation of a Stormwater Pollution Prevention Plan (SWPPP) to identify Best Management Practices (BMPs) to control stormwater runoff during construction of development projects.

City of Tustin General Plan: Geology and soils policies of the General Plan are contained in the Public Safety Element and C/OS/R Element, and include the following relevant to the Project:

- Public Safety Goal 3: Reduce the risk to the community from geologic and seismic hazards.

Policy 3.1: Require review of soil and geologic conditions by a State-Licensed Engineering Geologist to determine stability prior to the approval of development where appropriate.

Policy 3.5: Ensure that structures for human occupancy, critical structures, and vital emergency facilities are designed to minimize damage from potential geologic/seismic hazards and avoid functional impairment.

- C/OS/R Element Goal 13: Preserve Tustin's archaeological and paleontological resources.

Policy 13.1: Require a site inspection by certified archaeologists or paleontologists for new development in designated sensitive areas.

Policy 13.2: Require mitigation measures where development will affect archaeological or paleontological resources.

5.7.1.2 Existing Conditions

The City of Tustin, inclusive of the Project site, is located in the seismically active southern California region. The Alquist-Priolo Fault Zone closest to the City and the Project site is from the Whittier Fault, located approximately 10 miles north of the Project site.¹⁹ The closest known active fault to the Project site is the San Joaquin Hills fault, located approximately 4.09 miles to the south. A preliminary geotechnical investigation prepared for the Project, and contained in Appendix E of this Initial Study, confirms that there are no known active faults on or near the Project site, and finds that the potential for ground rupture due to an earthquake beneath the sites is considered relatively low.²⁰

Topographically, the Project site is relatively flat, with elevations ranging from 146 to 148 feet amsl. Site drainage generally sheet flows to the east. Historic high groundwater for the site is mapped at a depth of about 50 feet. The Project's preliminary geotechnical investigation found that the site is not susceptible to landsliding, nor is it located in a State-designated landslide zone, as identified by the California Geological Survey (CGS). Similarly, the site is not susceptible to liquefaction and is not within a CGS State-designated potentially liquefiable zone.

5.7.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project cause exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based*

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¹⁹ City of Tustin Hazard Mitigation Plan, 2019, page 3-24; [Fault Activity Map of California](#), accessed April 9, 2026.

²⁰ Preliminary Geotechnical Investigation, 17332 Irvine Boulevard, Tustin, California; prepared by Albus Associates, November 20, 2025, contained in Appendix E.

on other substantial evidence of a known fault), ground-shaking, liquefaction, or landslides?

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Map issued by the State Geologist for the area or base on other substantial evidence of a known fault?

No Impact. As discussed in Section 5.7.1, above, there are no designated Alquist-Priolo Fault Zone areas within the City. There are no potentially significant Project impacts related to rupture of a known earthquake fault as delineated on the Alquist-Priolo Earthquake Fault Map.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As discussed above, the site is situated in a seismically active area and near several seismically active faults that could generate ground shaking in Tustin and the Project site. The Project preliminary geotechnical investigation summarizes the seismic conditions of the site in accordance with United States Geological Survey (USGS) standards, and confirmed that there are no active faults known to the Project site through or immediately adjacent to the site.

From a geotechnical point of view, the preliminary geotechnical report finds that the development of the proposed 15 unit residential development is feasible. Additional geotechnical studies would be conducted prior to Project grading as required by the CBC and City standard of conditions of approval. Project construction must then comply with the requirements of the approved geotechnical report and CBC. Compliance with these measures would mitigate potential adverse impacts from strong seismic ground shaking, and would comply with General Plan Public Safety Element Goal 3, and Policies 3.1 and 3.5, listed previously in Section 5.7.1. Project impacts related to rupture of a known earthquake fault would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction can be defined as the loss of soil strength or stiffness due to a buildup of pore-water pressure during a seismic event and is associated primarily with relatively loose, saturated fine- to medium- grained unconsolidated soils. Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. A relatively shallow groundwater table (within approximately 40 feet or less below ground surface) or completely saturated soil conditions contribute to liquefaction.

As discussed previously, historic high groundwater for the site is mapped at a depth of about 50 feet, and the site is not susceptible to liquefaction and is not

within a CGS State-designated potentially liquefiable zone. Project impacts related to liquefaction would not be significant.

iv) Landslides?

No Impact. Landslides occur in areas of slope and are one of the hazards left behind by an earthquake. The General Plan Public Safety Element does not identify any landslide zones in the City, and the Project's preliminary geotechnical investigation found that the site is not susceptible to landsliding. Project impacts related to landslides would not be significant.

b) Would the Project cause substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Substantial erosion typically occurs from steep slopes, or from wind and rain in areas of exposed soils. Topsoil is generally defined as the upper, outermost layer of soil, usually the top 5–10 inches with a high concentration of organic matter and microorganisms.

The Project site and surrounding area are generally flat, and the site is currently developed with a commercial/office building, paving and limited vegetation. The Project would remove the existing building and paving and clear the site to install underground utilities, and then would cover the site with buildings, paving and landscaping. During Project construction, exposed soil on the site could be exposed to soil erosion and loss of top soil.

To reduce the potential for soil erosion and the loss of topsoil during construction, a SWPPP would be required for the Project pursuant to RWQCB regulations. The SWPPP would address site-specific conditions related to specific grading and construction activities, including potential sources of erosion, and would identify BMPs to prevent loss of topsoil during construction. Typical BMPs could include silt fencing, fiber rolls, or gravel bags; stabilized construction entrances/exits; hydroseeding, and similar measures. In addition to RWQCB requirements, the Project would need to comply with the City of Tustin Grading Manual procedures, which outlines requirements for grading and excavation. The potential Project impacts relative to soil erosion or loss of topsoil would be less than significant.

c) Would the Project cause location on a geologic unit or a 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. As discussed previously, the Project site is generally flat and not susceptible to landslides or liquefaction. The Project preliminary geotechnical investigation does not identify site conditions related to unstable soils or lateral spreading, subsidence or collapse.

Additional geotechnical studies would be conducted prior to Project grading as required by the CBC and City standard of conditions of approval. Project construction must then comply with the requirements of the approved geotechnical report and CBC. Compliance with these measures would mitigate

potential adverse impacts from unstable soil should they occur. Project impacts related to unstable soils would be less than significant.

- d) *Would the Project be located on expansive soil, creating substantial risks to life or property?*

Not Significant. Expansive soils are generally defined as soils that expand when water is added and shrink when they dry out. This continuous change in soil volume can cause buildings built on this soil to move unevenly and crack. The Project preliminary geotechnical investigation found that soil conditions of the site have a very low expansion potential. Project impacts related to expansive soils are not significant.

- e) *Would the Project cause soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. The Project site has an existing 8" public sewer main located within Mountain View Drive to the west. The Project proposes to connect to the existing public sewer system using a private connection. The Project would not use septic tanks or an alternative wastewater disposal system, and there would be no Project impacts associated with use of septic systems.

- f) *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less than Significant Impact. Paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multicellular plants, including their imprints, from a previous geologic period. The General Plan C/OS/R Element establishes Policy 13.1 to require a site inspection by certified archaeologists or paleontologists in designated sensitive areas, but does not identify the Project site or other surrounding areas as a "paleontological sensitive area." The Conservation, Open Space, and Recreation Element also does not identify any unique geologic features in the City.

The Project site is generally flat, and required project grading would involve surficial leveling and excavation for underground utilities. Given the lack of paleontological resources in the City and moderate Project grading, there is limited potential for unique paleontological resources to be found on the site. Project construction would be required to comply with the CBC and Tustin Grading Manual grading techniques which would serve to preserve any potential paleontological resources in the very unlikely event that a resource is encountered, and would comply with C/OS/R Element Goal 13, and Policies 13.1 and 13.2, listed previously in Section 5.7.1. Project impacts related to unique paleontological resources or geologic features would be less than significant.

5.7.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts relative to geology or soils. As a result, no mitigation is required.

5.8 GREENHOUSE GAS EMISSIONS

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

5.8.1 ENVIRONMENTAL SETTING

5.8.1.1 Regulatory Setting

Potential greenhouse gas emission impacts of the Project are reviewed within the context of the following regulatory setting:

State Climate Change Legislation: The State of California has established climate change legislation to reduce greenhouse gas emissions across all sectors of the economy, including the following:

- California Code of Regulations (CCR) Title 24, Part 6. CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.
- Assembly Bill (AB) 32, California Global Warming Solutions Act of 2006. AB 32 set the stage for the State's transition to a sustainable, low-carbon future. AB 32 was the first program in the country to take a comprehensive, long-term approach to addressing climate change.
- Senate Bill (SB) 375, Sustainable Communities & Climate Protection Act of 2008. SB 375 requires the Air Resources Board to develop regional greenhouse gas emission reduction targets for passenger vehicles GHG reduction targets for 2020 and 2035 for each region covered by the State's 18 metropolitan planning organizations.

- Senate Bill (SB) 100, California Renewables Portfolio Standard Program. SB100 established a landmark policy requiring renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers by 2045.

State GHG Reduction Implementation Plan: On December 11, 2008, the California Air Resources Board (CARB) adopted the 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. 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 the 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 CO₂ capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under the 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.

City of Tustin General Plan: The Tustin General Plan does not identify specific greenhouse gas goals or policies.

5.8.1.1 Existing Conditions

Greenhouse gases (GHG) refer to a group of compounds that are linked to change in global climate conditions. GHGs trap the heat from sunlight and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). The key GHG include the following:

- Carbon dioxide (CO₂) is an odorless, colorless gas, which has both natural and anthropogenic (arising from human activities) sources. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic out-gassing. Man-made sources of carbon dioxide are from burning coal, oil, natural gas, and wood. CO₂ emissions are mainly associated with fossil fuel combustion originating in California and out-of-state power plants that supply electricity to California. Other activities that produce CO₂ emissions include mineral production, waste combustion, and vegetation removal.

- Methane (CH_4) is a flammable gas and is the main component of natural gas. When one molecule of methane is burned in the presence of oxygen, one molecule of carbon dioxide and two molecules of water are released. A natural source of methane is from the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain methane, which is extracted for fuel. Other sources are landfills, fermentation of manure, and cattle.
- Nitrous oxide (N_2O), is produced naturally by microbial processes in soil and water. Man-made sources of nitrous oxide include agricultural sources, industrial processing, fossil fuel-fired power plants, and vehicle emissions. Nitrous oxide is also used as an aerosol spray propellant and in medical applications. In addition to CO_2 , CH_4 , and N_2O , GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and water vapor. Of all the GHGs, CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potential than CO_2 . To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2 , denoted as CO_2e .

5.8.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Air Quality section is based on the Air Quality Impact Study, contained as Appendix B to this Initial Study.

- a) *Would the project generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment?*

Less Than Significant Impact. Neither the SCAQMD nor the City of Tustin has adopted any numerical GHG thresholds. To assess the potential significance of Project GHG emissions, the Air Quality Study follows CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate or estimate GHG emissions. The Air Quality Study uses the CalEEMod to calculate GHG emissions from the construction and operation of the Project, and relies on consistency with the 2022 Scoping Plan to determine whether Project GHG emissions would either directly or indirectly have a significant impact.

Project generated construction GHG emissions are calculated for on-site Project and off-site construction activity, assuming a 13-month construction schedule. Construction GHG emissions are then amortized over a 30-year period, following SCAQMD guidelines, because GHG emissions remain in the atmosphere long after the construction activities have stopped.

During Project operation, the majority of greenhouse gas emissions, and specifically CO_2 , would be due to vehicle travel and energy consumption. As shown in Table 9, *Combined Operational and Construction GHG Emissions*, total Project operational and construction GHG emissions would be 217.08 Metric Tons CO_2e (MTCO_2e).

Table 9. Combined Operational and Construction GHG Emissions (MTCO₂e)

Source Category	Greenhouse Gas Emissions (Metric Tons CO ₂ e /Year)
Area Sources ¹	3.31
Energy Usage ²	47.53
Mobile Sources ³	152.46
Solid Waste ⁴	3.73
Water ⁵	3.80
Refrigerator	0.03
Construction	6.21
Total Emissions	217.08
1= Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment. 2= Energy usage consist of GHG emissions from electricity and natural gas usage. 3= Mobile sources consist of GHG emissions from vehicles. 4= Solid waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills. 5= Water includes GHG emissions from electricity used for transport of water and processing of wastewater.	

Regionally, recent GHG calculations from SCAG estimate that total GHG emissions for the SCAG region will be 112.30 million MTCO₂e per year by year 2030, and that total statewide GHG emissions will continue to decline due to advances in energy efficient transportation, building and water systems.²¹ The Project, as discussed below, would be consistent with Regional CARB 2022 Scoping Plan and 2020-2045 RTP/SCS policies regarding GHG reduction. As described in the Air Quality Study, the Project's estimated 217.08 MTCO₂e GHG emissions would have a less than significant impact on the environment.

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

Less Than Significant Impact. The Air Quality Impact Study assesses the Project's consistency with applicable GHG reduction plans, specifically the CARB 2022 Scoping Plan and the SCAG 2020-2045 RTP/SCS.

The CARB 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Table 10 *Consistency with the CARB 2022 Scoping Plan*, below, provides a listing of applicable CARB 2022 Scoping Plan actions/strategies and compares them against the Project to determine consistency. As shown in the Table, the Project would be consistent with applicable CARB 2022 Scoping Plan policies.

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²¹ SCAG Connect SoCal 2024 I-1 Final Program Environmental Impact Report [Appendix I: Updated Tables for the 2024 Final PEIR](#)

Table 10. Consistency with the CARB 2022 Scoping Plan	
Actions and Strategies	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. The Project would be required to provide Electric Vehicle (EV) charging station and bicycle parking space in accordance with the 2022 Title 24 standards and CALGreen Code, which would promote alternative modes of transportation to reduce VMT. As such, the Project would be consistent with this action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would be all electric and would install energy efficient electrical circuits and solar photovoltaic panels in accordance with the 2022 Title 24 standards and CALGreen Code. As such, the Project would be consistent with this action.
Construction Equipment	
Achieve 25% of energy demand electrified by 2030 and 75% electrified by 2045.	Consistent. The City of Tustin has not adopted an ordinance or program requiring electricity-powered construction equipment. However, if adopted, the Project would comply with the applicable goals or policies requiring the use of electric construction equipment in the future. As such, the Project would be consistent with this action.
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 the statewide disposal of organic waste from the 2014 level by 2020 and 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. California cities, including Tustin, are required to provide organic waste collection in residential areas. The Project would be required to participate in this organic waste collection service, and as such, the Project would be consistent with this action.

The SCAG 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals through the three key SCS strategies. Table 11, *Consistency with the 2020-2045 RTP/SCS*, below, lists these key SCS strategies and compares them against the Project to determine consistency. As shown in the Table, the Project would be consistent with applicable 2020-2045 RTP/SCS policies.

Table 11. Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options	
• Support investments and programs that are well-maintained and operated, coordinated, and resilient, and result in improved safety and air quality. • Ensure affordable, reliable, and accessible, quality travel options while striving to enhance equity in transportation resources offered in communities. • Plan for people of all ages, abilities, and backgrounds.	Consistent. The Project would replace the existing office use with 15 single-family residential units, thus developing underutilized land to provide additional residential uses to meet City’s growing housing demand. Furthermore, the Project is located less than 0.25 miles from the two nearest existing bus stops. Additionally, the proposed Project would include bicycle parking and electrical charging infrastructure and would support the use alternate fuel. Therefore, the Project would focus growth near destinations and mobility options.
Develop and connect, and sustain communities that are livable and thriving	
• Reinforce vibrant, human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances. Identify funding opportunities for new workforce and affordable housing development. • Produce and preserve a diversity of housing types to affordability, improve accessibility, choices for all. • Foster inclusive communities free from barriers that restrict access to opportunity, and actively seek to reduce racial and economic disparities.	Consistent. The Project is consistent with the objective of reinforcing human-centered communities by locating residential development within an established urban area that provides relatively good access to nearby commercial businesses, services, and daily amenities. This location supports shorter travel distances and increased opportunities for walking, bicycling, and transit use, thereby expanding mobility options and reducing reliance on single-occupant vehicle travel. By situating housing in an area with access to employment opportunities, services, and community amenities, the Project helps reduce barriers to housing opportunity and supports more inclusive community development. In this way, the Project would further the goal of fostering inclusive communities by expanding access to essential resources and opportunities and supporting broader efforts to reduce economic disparities, consistent with the intent of these policy objectives. Therefore, the Project would be consistent with this reduction strategy.
Create a healthy regional for the people of today and tomorrow.	
• Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stressors and disruptions, such as climate change.	Consistent. The proposed Project is consistent with Connect SoCal 2024 goals by promoting resilience, sustainability, and livability. It incorporates native landscaping, permeable surfaces, and adaptive reuse

Table 11. Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Project Consistency Analysis
• Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions, and enable more sustainable use of energy and water. • Conserve and restore the region's natural and agricultural resources.	strategies to reduce water demand and support climate adaptation. The central location near transit stops and bicycle facilities encourage multimodal transportation, reducing vehicle trips and greenhouse gas emissions. Stormwater infiltration systems, locally sourced materials, and renewable energy features conserve resources and improve environmental quality. Overall, these measures align with regional objectives for a healthy, efficient, and resilient community.

As shown in Tables 10 and 11, the Project would be consistent applicable CARB 2022 Scoping Plan and 2020-2045 RTP/SCS policies regarding GHG reduction. The Project impacts relative to conflicts with policies or regulations aimed at reducing greenhouse gas would be less than significant.

5.8.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would result in less than significant impacts relative to GHG emissions. As a result, no mitigation is required.

5.9 HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
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?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires?				X

5.9.1 ENVIRONMENTAL SETTING

5.9.1.1 Regulatory Setting

Potential hazards and hazardous materials impacts of the Project are reviewed within the context of the following regulatory setting:

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund: CERCLA was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment.

Asbestos Hazard Emergency Response Act (AHERA): AHERA requires the EPA to promulgate regulations (e.g., the Asbestos-Containing Materials in Schools Rule) requiring local educational agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans and perform asbestos response actions to prevent or reduce asbestos hazards.

American Society for Testing and Materials (ASTM): ASTM was established by the EPA to define appropriate testing procedures and measurements for hazardous materials.

California Land Reuse and Revitalization Act (CLRRRA): CLRRRA is promulgated by the California Health and Safety Code as a step-wise process for the evaluation and remediation of environmentally impacted properties under the supervision of the California Department of Toxic Substances Control (DTSC) or the applicable Regional Water Quality Control Board. DTSC is the state agency that regulates hazardous materials in the environment by overseeing the cleanup of land, enforcing hazardous waste laws, reducing hazardous waste generation, and compelling manufacturers to make safer products.

Section 65962.5(a)(1) - Cortese List. Section 65962.5(a)(1), also known as the Cortese List: As required by the California Health and Safety Code, DTSC compiles and annually updates a list of all hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the CHSC. DTSC operates the Envirostar website which identifies hazardous waste sites consistent with the Cortese list requirement.

California Occupational Safety and Health Administration (CalOSHA): CalOSHA is the state agency responsible for promulgating and enforcing State health and safety standards and implementing Federal Occupational Safety and Health Administration (OSHA) Laws. CalOSHA's regulatory scope includes provisions to minimize the potential for release of asbestos and lead during construction and demolition activities.

Regional Southern California Air Quality Management District (SCAQMD) Rule 1403: This regulation requires notification of the SCAQMD prior to commencing any demolition or renovation activities that involve asbestos containing materials. Rule 1403 also sets forth specific procedures for the removal of asbestos and requires that

an onsite representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of asbestos-containing materials. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing and demolition activities do not expose construction workers or nearby receptors to significant health risks associated with asbestos-containing materials.

City of Tustin Hazards Mitigation Plan: The City has adopted a Hazards Mitigation Plan which is a tool that the City and local agencies with infrastructure in Tustin can take to minimize damage and includes maps showing the hazards based on intensity. The plan focuses on risks from earthquakes, fires, floods, human-caused events (such as terrorists attacks) and liquefaction.

City of Tustin General Plan: Hazards and hazardous materials policies of the General Plan are contained in the Public Safety Element, and include the following relevant to the Project:

- Public Safety Goal 4: Reduce the risk to the community's inhabitants from exposure to hazardous materials and wastes.

Policy 4.3: Transportation of hazardous waste will be minimized and regulated where possible to avoid environmentally sensitive areas and populated, congested, and dangerous routes.

- Public Safety Goal 5: Reduce the risk to the community's inhabitants from fires or explosions.

Policy 5.2: Encourage the use of fire retardant roofing materials.

Policy 5.4: Enforce building code requirements that assure adequate fire protection.

5.9.1.2 Existing Conditions

The "Phase I and II Environmental Site Assessment, 17332 Irvine Boulevard, Tustin, California" (ESA) prepared for the Project, and contained in Appendix C of this Initial Study, presents the following findings regarding existing on-site hazards and hazardous materials on the Project site:

- Past agricultural activities on the site and in adjacent areas indicates a potential for historical application of chemicals such as organochlorine pesticides ("OCPs") and lead and arsenic-based herbicides which could still be present in site soils. Health risks are associated with these chemicals.
- To determine the residual concentration of past agricultural chemicals on the Project site, soil sampling was conducted in support of the ESA. Based on the results of the sampling, no OCPs were detected, and concentrations of lead were well below EPA residential screening level (RSL) of 400 mg/kg and the DTSC residential screening level of 80 mg/kg. Arsenic was detected at 5.7 and 5.1 mg/kg, in soil samples. However, as stated in the ESA, naturally-occurring arsenic is present in soil across the state of California, and the rates detected on the Project site are below the California naturally-occurring regional

background levels of 0.6 to 11.0 mg/kg. Therefore, arsenic is not considered a concern to the Project site, and the ESA recommends on further investigation.²²

- The existing commercial/office building on the Project site was constructed circa 1972, therefore, asbestos-containing materials (ACMs) and lead based paint (LBP) may be present within building materials associated with the existing building. To determine the presence of ACMs or LBP in the building, the ESA recommends conducting an ACM and LBP survey to investigate the potential presence of ACMs and LBP in accordance with applicable federal and local regulations prior to demolition in order to determine whether, and the extent to which, abatement may be necessary.
- The existing parking lot is constructed of asphalt. Petromat, an ACM stress-absorbing fabric, was sometimes used in asphalt paving prior to 1978. To determine if Petromat is present in the existing parking lot, samples of the parking lot were tested as part of the ESA. Although Petromat in the samples, levels of ACM concentrations were not detected, and the ESA concludes that the existing Petromat is unlikely to represent an environmental concern and recommends no further investigation regarding asphalt at the Property. However, in relation to demolition and disposal of the asphalt, the ESA recommends that the demolition contractor for the contractor be made aware that Petromat is present in the asphalt.²³
- Regarding the existing condition of the Project site, the ESA identified no underground or above ground storage tanks, no stains, discharge or odors, and no other potential hazards or hazardous materials,

5.9.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less Than Significant with Mitigation Incorporated. Based on the ESA findings, the existing building may contain ACMs and LBP, which, if present, must be managed, removed, and disposed of in accordance with all applicable laws, including guidelines of OSHA and Cal-OSHA, and the requirements of the SCAQMD. The Asbestos Hazard Emergency Response Act (AHERA) sets standards for the surveying, sampling and removing of ACMs. Removal of asbestos is further regulated by the South Coast Air Quality Management District (SCAQMD) Rule 1403. To ensure that the potential ACMs are properly addressed, Mitigation Measure HAZ-1 is included in the Project. This mitigation measure requires that the Applicant provide an ACM survey prior to any demolition or ground-disturbing activities on the Project site. The survey must be conducted by an AHERA and Cal/OSHA certified building inspector to determine the presence or absence of ACM. If ACM is located within the existing building, removal of asbestos must be

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²² Phase I and II Environmental Site Assessment (ESA), 17332 Irvine Boulevard, Tustin, California; prepared by Stantec Consulting Services, Inc.; November 13, 2025; pages 20-21. (Appendix C)

²³ Ibid, page iv.

conducted in accordance with Rule 1403 regulations and completed prior to any activities that would disturb the ACMs.

To ensure that the potential LBP with the existing building is properly addressed, Mitigation Measure HAZ-2 is included in the Project. This mitigation measure requires that the Applicant provide a LBP survey prior to any demolition or ground-disturbing activities on the Project site. The survey must be conducted by a Cal/OSHA certified building inspector to determine the presence or absence of LBP. If LBP is located within the existing building, abatement of the LBP must be completed prior to any activities that would disturb the ACMs. These mitigations comply with Public Safety Element Goal 4 and Policy 4.3, listed previously in Section 5.6.1.

With incorporation of Mitigation Measures HAZ-1 and HAZ-2, potential Project impacts regarding on-site hazardous materials would be reduced to less than significant levels.

- b) *Would the Project 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 with Mitigation Incorporated. As a residential development, the Project is not associated with the significant transport or use of hazardous materials. Project construction, in compliance with state laws, would not use hazardous materials. However, as discussed above, the existing building may contain ACMs and/or LBP, which require proper management and removal to ensure no hazardous substances are emitted into the environment. Mitigation Measures HAZ-1 and HAZ-2 are included in the Project to ensure ACMs and LBP surveys are conducted prior to any demolition or ground-disturbing activities, and if found, ACMs and LBP are removed in compliance with applicable federal, state and regional regulations. With inclusion of this measure, potential Project impacts regarding significant hazards from the release of hazardous materials would be reduced to less than significant levels.

- c) *Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

No Impact. The CEQA Guidelines set one-quarter mile as the threshold in which sensitive receptors, such as students, could be adversely impacted by hazardous materials, substances and waste. Schools near the Project site include Helen Estock and Tustin Connect Elementary Schools located at 14741 N. B Street and Columbus Tustin Middle School, located at 17952 Beneta Way. These schools are located 0.3 and 0.8 mile from the Project site, respectively, both outside the one-quarter mile threshold. Further as a residential development, the Project is not associated with the emission or use of hazardous materials. Potential existing on-site ACMs or LBP would be managed and removed in accordance with Mitigation Measures HAZ-1 and HAZ-2. Potential Project impacts regarding emitting

hazardous emissions, materials, substances or waste within one-quarter mile of a school would not be significant.

- d) *Would the Project 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, as discussed in Section 5.9.1, requires the DTSC listing of identified hazardous waste sites. The ESA found no listing of a hazardous waste site on the Project site and no nearby hazardous waste sites at risk of affecting the Project site. This finding is supported by a recent review of the DTSC Envirostar website.²⁴ The Project would not create a significant hazard to the public or the environment pursuant to Government Code Section 65962.5.

- 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 closest airport to the Project site is the John Wayne Airport (SNA), located approximately 5 miles southwest of the Project site. The Project site is located outside of the airport's 60 dBA CNEL noise contour, and outside the airport's land use plan.²⁵ The Project would not result in an impact related to an airport safety or noise hazards.

- f) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

No Impact. Figure PS-1 of the General Plan Public Safety Element identifies the City's major roadways as emergency evacuation route. Irvine Boulevard, located immediately adjacent to the Project site is included as an emergency evacuation route. Project construction does not propose any road closures that could impair emergency evacuation routes.

In addition, the Project is required to design and construct internal access and provide fire suppression facilities in conformance with the Tustin City Code and the Fire Department standards.²⁶ Project impacts relative to the implementation or interference with the City's emergency response or evacuation plans would be less than significant.

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²⁴ <http://www.envirostar.dtsc.ca.gov/public/mapfull.asp?global>; accessed March 12, 2026.

²⁵ The Airport Environs Land Use Plan (AELUP); [Airport Land Use Commission | John Wayne Airport, Orange County](#); accessed April 9, 2026.

²⁶ Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), as adopted by the Tustin City Code Section 8100.

- g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

No Impact. As shown in the Local Responsibility Area Fire Hazard Severity Zones map dated March 24, 2025 (California Department of Forestry and Fire, 2025), the City of Tustin contains very high fire severity zones in the northeast portion of the City. The Project site is currently developed as a commercial site and is located in an urbanized area. In addition, the Project would replace the existing 1970's commercial/office building with a contemporary residential development built to the most recent Building and Fire Code requirements, and would comply with Public Safety Element Goal 5, and Policies 5.2 and 5.4, listed previously in Section 5.9.1. The Project would not expose people or structure to a significant risk from wildland fires.

5.9.3 MITIGATION MEASURES

The following measures would be required to mitigate potential Project impacts related to hazards or hazardous materials to less than significant levels:

Mitigation Measure HAZ-1: Asbestos.

Timing: Prior to demolition activities.

Department Responsible: Community Development (Planning and Building Divisions).

Prior to demolition activities, the Applicant shall provide an asbestos survey conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos containing-materials (ACMs). If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. The State certified asbestos containment contractor shall provide evidence acceptable to the City Building Official that asbestos surveys, containment and removal have been completed as required by SCAQMD.

Mitigation Measure HAZ-2: Lead-Based Paint.

Timing: Prior to demolition activities.

Department Responsible: Community Development (Planning and Building Divisions).

Prior to demolition activities, the Applicant shall provide a lead-based paint survey conducted by a California Department of public Health (CDPH) certified building inspector to determine the presence or absence of lead-based paint (LBP). If LBP is located, abatement shall be completed prior to any activities that would disturb the LBP. LBP removal shall be performed by a State certified contractor, who shall provide evidence acceptable to the City Building Official

that LBP survey, containment and removal have been completed as required by state and federal regulations.

5.10 HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site;				X
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				X
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X
iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

5.10.1 ENVIRONMENTAL SETTING

5.10.1.1 Regulatory Setting

Potential hydrology and water quality impacts of the Project are reviewed within the context of the following regulatory setting:

Federal Clean Water Act: The Federal Water Pollution Control Act of 1948 was the first major U.S. law to address water pollution. Growing public awareness and concern for controlling water pollution led to sweeping amendments in 1972. As amended in 1972, the law became commonly known as the Clean Water Act (CWA). National Pollutant Discharge Elimination System (NPDES). The NPDES permit program implements the CWA by addressing water pollution and by regulating point sources that discharge pollutants to waters of the United States. Construction activities that disturb one acre or more are required to obtain coverage under the state's Construction General Permit include clearing, grading, and other disturbances. The permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) with a monitoring program.

Regional Water Quality Control Board Permit: The State of California manages water quality through Regional Water Quality Control Boards (RWQCB). The City of Tustin is within RWQCB District 8, Santa Ana Region, which regulates urban stormwater runoff through the Municipal Separate Storm Sewer System (MS4) Permit (Order No. R8-2009-0030). THE Permit lists allowable and unallowable discharges and requires implementation of Low Impact Development (LID) infrastructure, which are engineered facilities that are designed to retain and/or biotreat runoff on the project site.

County of Orange Drainage Area Management Plan: The Drainage Area Management Plan (DAMP) is the County's primary policy, planning and implementation document for NPDES Permit compliance. The DAMP requires that new development and significant redevelopment projects (or priority projects) develop and implement a Preliminary WQMP that includes best management practices (BMPs) and preliminary low impact design features (LID) that would provide onsite treatment of stormwater to prevent pollutants from onsite uses from leaving the site.

City of Tustin General Plan: Hydrology and Water Quality policies of the General Plan are contained in the C/OS/R Element, and include the following relevant to the Project:

- C/OS/R Element Goal 8: Conserve and protect significant topographical features, important watershed areas, resources, and soils.

Policy 8.2: Control erosion during and following construction through proper grading techniques, vegetation replanting, and the installation of proper drainage improvements.

5.10.1.2 Existing Conditions

Currently, the Project site drains via surface flow to the east and eventually to the northeast. Concrete valley gutters collect the majority of the runoff and drain above ground to Mountain View Drive, over the sidewalk and into the curb and gutter. The closest public drainage facility to the site are catch basins located on the south and north sides of Irvine Boulevard, approximately 1,000 feet to the east of the site. Additionally, there is a public storm drain approximately 700 feet to the south in W First Street.²⁷

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) shows that the Project site and surrounding properties are within Flood Hazard Zone X which is 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile, outside the 100 year flood zone.²⁸

5.10.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) *Would the Project violate any water quality standards or waste discharge requirements?*

Less Than Significant Impact. Project demolition, grading and construction activities could result in pollutants from debris, sediment and heavy equipment that could mix with stormwater and degrade the quality of waters flowing into the City's catch basins. Post development, Project operation could result in pollutants from vehicular use and household and landscape chemicals that also could mix with stormwater and degrade the quality of waters flowing into public catch basins.

As discussed previously in Section 6.7.2, a SWPPP would be required for the Project to control stormwater runoff during construction. The SWPPP would identify BMPs such as silt fencing, fiber rolls, or gravel bags; stabilized construction entrances/exits; hydroseeding, and similar measures. Implementation of the SWPPP would ensure the Project's compliance with the RWCQB MS4 permit.

As required by the County DAMP, a Preliminary WQMP has been prepared for the Project which describes planned post-development drainage and stormwater collection.²⁹ As described in the Preliminary WQMP, the Project would maintain existing drainage patterns, collecting runoff in curb gutters and area drain inlets

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²⁷ Preliminary Due Diligence Report: 17332 Irvine Blvd, Tustin, California; prepared by Advanced Civil Group, Inc., dated December 1, 2025; contained in Appendix A.

²⁸ Ibid.

²⁹ Preliminary Water Quality Plan (WQMP), Project: TOC-17332 Irvine Boulevard, Tustin, CA: prepared by Advanced Civil Group, Inc, dated April 27, 2026; contained in Appendix F.

and conveyed in a easterly direction towards the site's low point. The single on-site storm drain inlet in the east collects the runoff and conveys LID flows through the underground storage and infiltration system under the east portion of the Project drive. High flows, flow through the underground storage and infiltration and drain into the Mountain View Drive curb and gutter and into the City MS4 system. The City has reviewed and approved the preliminary WQMP, and would require a final WQMP to be submitted for review and approval prior to the grading permit stage.

The proposed Project would be required to comply with all applicable water quality and waste discharge requirements, and potential Project impacts regarding violation of any water quality standards or waste discharge standards would be less than significant.

- b) Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned used for which permits have been granted)?*

No Impact. Post development, the Project would reduce the amount of impervious surfaces that would prevent water from soaking into the ground. The Project would have 56% of the site covered in impervious surfaces, compared to the existing condition that has 89% of the site covered with impervious surfaces.³⁰ In addition, the Project does not propose wells or other activities that would deplete groundwater supplies. No Project impacts would occur relative to substantial depletion of groundwater supplies or interference with groundwater recharge.

- c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

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

No Impact. As discussed above, the Project would retain the existing site drainage conditions, collecting and filtering runoff before releasing it to the curb and gutter system along Mountain View Drive. Potential erosion during construction would be controlled through the SWPPP process. No Project impacts would occur relative to substantial alteration of the existing drainage pattern of the site or area or substantial erosion. Similarly, the Project would comply with applicable C/OS/R Element policies to control erosion.

- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*

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³⁰ Ibid.

No Impact. As discussed above, the Project proposed stormwater collection and treatment system would adequately control the flow of runoff into the existing public storm drains and basins. The Project would not substantially increase the rate of surface runoff in a manner that would result in any flooding.

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

No Impact. As discussed in Section 5.10.2.a, above, the Project would retain the existing drainage pattern, collect and filter runoff on site, then release the flows to the existing curb and gutter system on Mountain View Drive. The Project would not exceed capacity of existing stormwater drainage systems or add polluted runoff.

iv) Impede or redirect flood flows?

No Impact. As discussed above, the Project site is located within Zone "X", outside of the 100-year floodplain. The Project would retain the existing drainage pattern, flowing to the existing curb and gutter system on Mountain View Drive. The Project would not impede or redirect flood flows or exceed capacity of existing stormwater drainage systems or add polluted runoff.

d) Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. A tsunami is a tidal wave or sea wave caused by seismic activity. Tustin is located inland approximately 12 miles from the Pacific Ocean and is not subject to tsunamis. 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 not proximate to a body of water and is not susceptible to a seiche.

As discussed previously, the Project site is not located within a 100-year flood zone, and site runoff would be collected and filtered in accordance with the Project WQMP. The Project would not result in risk of pollutant release during flood hazard, tsunami or seiche.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed previously, the Project proposes an on-site stormwater system to collect and filter runoff. The Project would result in a decrease in impervious surfaces over existing conditions. Potential impacts regarding Project conflicts with or obstruct implementation of a water quality control or groundwater management plan would be less than significant.

5.10.3 MITIGATION MEASURES

The analysis determined that the proposed Project would result in no or less than significant adverse impacts regarding hydrology and water quality. No mitigation is required.

5.11 LAND USE AND PLANNING

LAND USE AND PLANNING. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Physically divide an established community?				X
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?			X	

5.11.1 EXISTING SETTING

5.11.1.1 Regulatory Setting

Potential land use and planning impacts of the Project are reviewed within the context of the following regulatory setting:

State of California Government Code: Chapter 65000-66037 of the California Government Code establishes local government planning and zoning authority and obligations, and requires each local jurisdiction to prepare a General Plan. As established by the State, the General Plan is the comprehensive long-term plan for the physical development of the county or city.

City of Tustin General Plan: Land Use and Planning policies of the General Plan are contained in the Housing and Land Use Elements, and include the following relevant to the Project:

- Housing Element Goal 1: Provision of an adequate supply of housing to meet the need for a variety of housing types and the diverse socio-economic needs of all community residents commensurate with the City's identified housing needs in the RHNA allocation.

Housing Element Policy 1.5: SMART GROWTH PRINCIPLES - Encourage infill development or site redevelopment within feasible development sites for homeownership and rental units through the implementation of smart growth principles, allowing for the construction of higher density housing, affordable housing, and mixed-use development (the vertical and horizontal integration of commercial and residential uses) in proximity to employment opportunities, community facilities and services, and amenities.

- Land Use Element Goal 1: Provide for a well-balanced land use pattern that accommodates existing and future needs for housing, commercial and industrial land, open space and community facilities and services, while maintaining a healthy, diversified economy adequate to provide future City services.

Land Use Element Policy 1.1: Preserve the low-density quality of Tustin's existing single-family neighborhoods while permitting compatible multi-family development to meet regional housing needs where best suited from the standpoint of current development, accessibility, transportation and public facilities.

Land Use Element Policy 1.5: Encourage compatible and complementary infill of previously by-passed parcels in areas already predominately developed.

City of Tustin City Code : Chapter 9244 of the City Code specifies the purpose of the Planned Community District as follows:

- To allow diversification of the relationships of various buildings, structures and open spaces in planned building groups while ensuring substantial compliance with the district regulations and other provisions of this Chapter. The intent of this Chapter is to ensure that adequate standards related to the public health, safety and general welfare shall be observed without unduly inhibiting the advantage of large scale planning for residential, commercial and industrial purposes. The amenities and compatibilities of PC Districts are to be ensured through the adoption of a Development Plan and/or the approval of Conditional Use Permits, maps, diagrams, and text setting forth land use relationships and development standards.

5.11.1.2 Existing Conditions

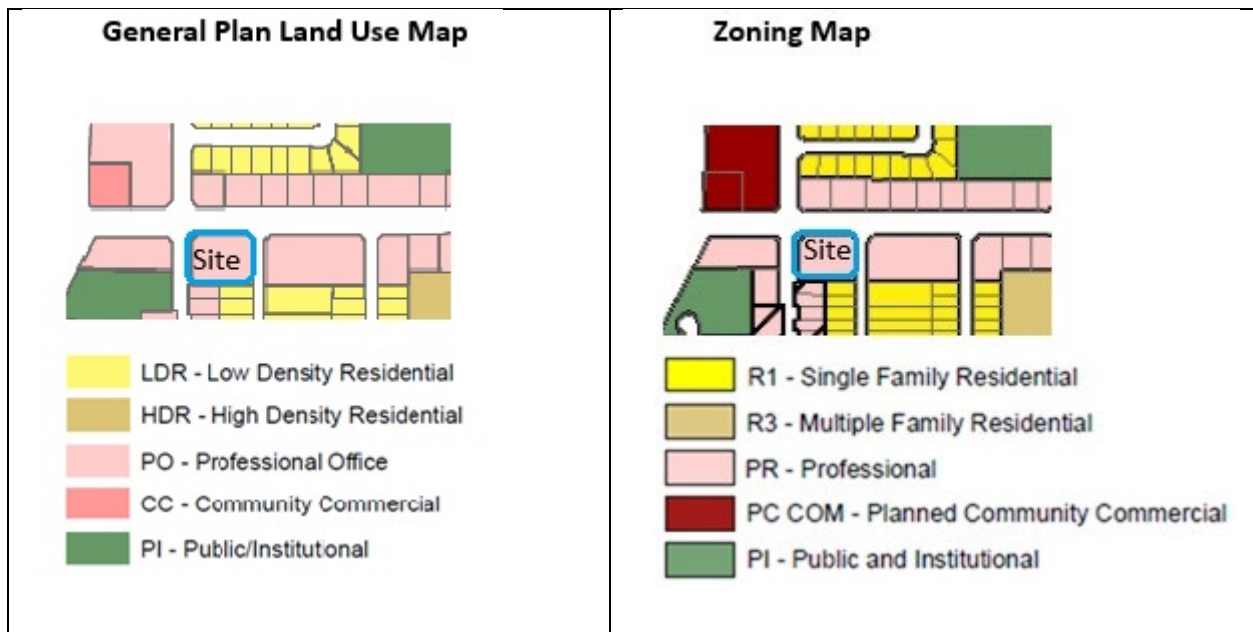
The Project site is currently developed with a two-story multi-tenant commercial/office building, and asphalt parking lot and ornamental landscaping. Table 12, *Existing Land Use, General Plan and Zoning Map Designations – Project Site and Surrounding Areas*, below, summarizes existing land uses and applicable General Plan Land Use Map and Zoning Map designations for the Project site and immediate surrounding areas:

Table 12. Existing Land Use, General Plan and Zoning Map Designations – Project Site and Immediate Surrounding Areas			
	Existing Land Use	Existing General Plan Land Use Designation	Existing Zoning Designation
Project Site:	Commercial Building	Professional Office (PO)	Professional (PR)
Surrounding Properties:			
North	Commercial Buildings	Professional Office (PO)	Professional (PR)
South	Single-family Residential/Office	Low Density Residential (LDR)/Professional Office (PO)	Single-family Residential (R-1)/Professional (PR)

Table 12. Existing Land Use, General Plan and Zoning Map Designations – Project Site and Immediate Surrounding Areas			
	Existing Land Use	Existing General Plan Land Use Designation	Existing Zoning Designation
West	Commercial Building	Professional Office (PO)	Professional (PR)
East	Commercial Building	Professional Office (PO)	Professional (PR)

Existing General Plan Land Use Map and Zoning Map designations for the site and general surrounding areas are shown in Figure 14, *Project Site and General Surrounding Areas Land Use/Zoning Map Designation*.

Figure 14. Project Site and General Surrounding Areas Land Use/Zoning Map Designations



5.11.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) *Would the Project physically divide an established community?*

No Impact. The Project proposes to change the site from a commercial/office use to single-family residential. Existing single-family residential uses are located immediately south of the site, and across Irvine Boulevard to north. The proposed single-family character of the Project would be similar to surrounding residential uses. Project impacts relative to physical division of an established community would not be significant.

b) *Would the Project 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. To accommodate the proposed land use change from commercial/office to single-family residential, the Project proposes a General Plan Land Use Map amendment from Professional Office (PO) to Planned Community Residential (PC RES), and Zone Change from Professional District (PR) to Planned Community Residential (PC RES). Zoning for the PC RES designation is governed by Chapter 9244 of the City Code , which as discussed previously, allows diversification of the relationships of various buildings, structures and open spaces in planned building groups.

The Planned Community District regulations for the Project would establish the following land use and development standards specific to the site:

- Permitted Land Uses: Single-family detached homes; Duplex homes; Accessory uses customarily incidental to residential use, including private garages, driveways, and private open space areas; Home occupations, subject to the provisions of
- Development Standards:
 - Gross Acres: 0.996 acres
 - Gross Density: 15.1 du/ac
 - Lot Coverage: 45%
 - Setback - Front to Irvine Boulevard: 20'
 - Setback - Side to Mountain View Drive: 9'
 - Setback - Side to Yorba Street: 9'
 - Setback - Rear to existing single-family development: 18'
 - Between onsite Project buildings: Subject to California Building Code
 - Maximum Building Height: Three stories, 39 feet, with the height of livable/occupied space not to exceed 37 feet, and the maximum overall building height, including roofs and parapets, not to exceed 39 feet.
 - Parking: Guest parking in private drives (2 per unit, 30 total)
 - Unit Parking: Enclosed private garages (2 per unit, 30 total).

Pursuant to City Code Section 9295, the proposed Project General Plan and Zoning Code land use changes and Project Planned Community District regulations would be subject to Planning Commission review and recommendation, and to City Council review and approval. This review would include consistency with applicable General Plan policies. By providing new housing on an infill site, while preserving the integrity of existing surrounding single-family neighborhoods, the Project would be consistent with the General Plan goals and policies, noted previously in Section 5.11.1.

Subject to the City's approval of the proposed land use changes, Project conflicts with an applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

5.11.3 MITIGATION MEASURES

The analysis determined that the proposed Project would not result in any significant adverse impacts regarding land use and planning. No mitigation is required.

5.12 MINERAL RESOURCES

MINERAL RESOURCES. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	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?				X
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?				X

5.12.1 ENVIRONMENTAL SETTING

Potential mineral resources impacts of the Project are reviewed within the context of the following regulatory setting:

5.12.1.1 Regulatory Setting

State of California Department of Conservation: The State of California Department of Conservation maps the states mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975 which requires the State Geologist to classify land into mineral resource zones based on the known or inferred mineral resource potential of that land. Areas are classified based on geologic factors without regard to existing land use and land ownership. The primary goal is to ensure that important mineral resources do not become inaccessible due to uninformed land-use decisions.

City of Tustin General Plan: The City of Tustin General Plan C/OS/R Element states that the only mineral resource identified within the Tustin Planning Area is the Mercury-Barite deposit in Red Hill (the hill). However, this resource is not utilized. Red Hill is located in the northern portion of the City, not proximate to the Project site. Therefore, there are no General Plan mineral resource goals or policies applicable to the Project.

5.12.1.2 Existing Conditions

There are no mineral resources or State of California Department of Conservation mineral resource zones on or near the Project site.

5.12.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project 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. The City of Tustin, inclusive of the Project site, is not identified by the California Department of Conservation as containing significant mineral resources.³¹ The only mineral resource identified in the General Plan is a Mercury-Barite deposit in Red Hill, located in the northern portion of Tustin, not proximate to the Project site. Project impacts relative to mineral resources are not relevant to the Project and would not be significant.

- b) *Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, proposed project, or other land use plan?*

No Impact. As discussed above, there are no significant mineral resources within the City, inclusive of the Project site. The Project would not result in the loss of a locally important mineral resource recovery site.

5.12.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on mineral resources. As a result, no mitigation is required.

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³¹ <https://maps.conservation.ca.gov/mineralresources>; accessed April 9, 2026.

5.13 NOISE

NOISE. Would the project result in:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
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?				X

5.13.1 ENVIRONMENTAL SETTING

5.13.1.1 Regulatory Setting

Potential noise impacts of the Project are reviewed within the context of the following regulatory setting:

State of California General Plan Guidelines 2017: Published by the California Governor's Office of Planning and Research (OPR) (OPR Guidelines), these guidelines provide guidance for the compatibility of projects within areas of specific average noise exposures. The OPR Guidelines identify the suitability of various types of uses relative to a range of outdoor noise levels and provide each local community some flexibility in setting local noise standards that allow for the variability in community preferences. Findings presented in the Levels of Environmental Noise Document (EPA 1974) influenced the recommendations of the OPR Guidelines, most importantly in the choice of noise exposure metrics (i.e., Ldn or CNEL) and in the upper limits for the normally acceptable outdoor exposure of noise-sensitive uses.

City of Tustin General Plan: Policies related to noise are contained in the Noise Element of the General Plan, and include the following which are relevant to the Project:

- Noise Element Goal 2: Incorporate noise considerations into land use planning decisions.

Policy 2.3: Use noise/land use compatibility standards as a guide for future planning and development.

Policy 2.4: Review proposed projects in terms of compatibility with nearby noise sensitive land uses with the intent of reducing noise impacts.

Policy 2.5: Require new residential developments located in proximity to existing commercial/industrial operations to control residential interior noise levels as a condition of approval.

- Noise Element Goal 3: Develop measures to control non-transportation noise impacts.

Policy 3.2: Minimize the impacts of construction noise on adjacent land uses through limiting the permitted hours of activity.

The City Noise Element also establishes maximum acceptable interior and exterior noise standards for land uses within the City. For residential uses, including single-family, multifamily and duplex, the Noise Element sets a standard of 45 dBA CNEL for interior noise, and 65 dBA CNEL for exterior noise.

ity of Tustin City Code : Article 4, Chapter 6, of the City's City Code establishes noise standards for various land use categories affected by stationary noise sources. Table 13, *City of Tustin Interior and Exterior Noise Standards (Residential)*, below, shows the City's acceptable standards for stationary noise in residential areas:

Table 13. City of Tustin Interior and Exterior Stationary Noise Standards (Residential)		
	Noise Level	Time Period
Exterior	55 dB(A)	7:00 a.m.—10:00 p.m.
	50 dB(A)	10:00 p.m.— 7:00 a.m.
Interior	55 dB(A)	7:00 a.m.—10:00 p.m.
	45 dB(A)	10:00 p.m.— 7:00 a.m.

Stationary noises that exceed the exterior noise standards shown above in Table 15 are considered unacceptable under the following conditions:

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

Stationary noises that exceed the interior noise standards above in Table 13 are considered unacceptable under the following conditions:

- 1) Exceeds the interior noise standard for a cumulative period of more than five (5) minutes in any hour; or
- 2) Exceeds the interior noise plus five (5) dB(A) for a cumulative period of more than one (1) minute in any hour; or
- 3) Exceeds the interior noise standard plus ten (10) dB(A) for any period of time.

The Noise Ordinance also establishes limitations for the times and days that construction activities can occur. Construction activities are limited to the hours of 7:00 a.m. and 8:00 p.m. Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturdays. Construction is prohibited on Sundays and City-observed federal holidays.

5.13.1.2 Existing Conditions

Current uses on the Project site consist of a commercial/office building. The existing ambient noise sources in the vicinity of the Project site include vehicle noise from adjacent roadways and typical noise from the adjacent residential and commercial uses, which include people talking, doors closing, and landscape maintenance equipment.

5.13.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Noise section is based on the "17332 Irvine Boulevard Residential Project Noise Impact Analysis, City of Tustin," prepared by MAT Engineering, Inc., dated May 9, 2026 (Noise Study), and contained in this Initial Study as Appendix G. The Noise Study applies the general noise measurements described below:

Noise Measurements: Since the human ear is not equally sensitive to all sound frequencies within the entire auditory spectrum, human response is factored into sound descriptions by weighting sounds within the range of maximum human sensitivity more heavily in a process called "A-weighting," written as dB(A). Any further reference in this discussion to decibels written as "dB" should be understood to be A-weighted. Time variations in noise exposure are typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period, called equivalent sound level (Leq).

Typical human hearing can detect changes in sound levels of approximately 3 dBA under normal conditions. Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is discernable to most people in an exterior environment while a change of 10 dBA is perceived as a doubling of the noise. Because people are generally more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Ldn (day-night) or the Community Noise Equivalent Level (CNEL). The CNEL metric has gradually replaced the Ldn factor, but the two descriptors are essentially identical.

- a) *Would the Project generate 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. The Noise Impact Study evaluated noise impacts from the Project that could occur both during construction and operation.

Baseline Noise: To determine the existing noise level environment at the Project Site, short-term noise measurements were taken at two locations as part of the Noise Study. Table 14, *Noise Monitoring Locations and Measurements*, below, describes the locations, times that noise measurements were taken and the noise levels measured; and Figure 15, *Noise Monitoring Locations*, graphically shows the noise monitoring locations. Measured daytime noise levels ranged from 59.1 to 64.0 dBA Leq.

Table 14. Noise Monitoring Locations and Measurements					
Site No.	Location	Time	Leq	Lmin	Lmax
			(dBA)	(dBA)	(dBA)
1	At the southwest corner of the Project site	3:06 p.m.	59.1	48.0	76.7
2	In front of Health South Tustin Rehabilitation located at 14851 Yorba Street	3:18 p.m.	64.0	52.2	79.6
Notes: Leq = Equivalent noise measurement Lmin = Minimum sound levels Lmax = Maximum sound levels					

Figure 15. Noise Monitoring Locations



(SOURCE: NOISE STUDY)

Construction Noise: Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. The Project construction activities are expected to begin in 2027, and the project would be operational in the year 2028, and would include the following phases: demolition, site preparation, grading, building construction, paving, and architectural coating. The demolition and grading phases typically create the highest levels of noise.

Article 4, Chapter 6, of the City's City Code limits the erection, demolition, alteration, repair, excavation, grading, paving or construction of any building or site between the hours of 7:00 a.m. and 8:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturdays. Construction is prohibited on Sundays and City-observed federal holidays. Trucks, vehicles, and equipment that are making or are involved with material deliveries, loading or transfer of materials, equipment service, maintenance of any devices or appurtenances to any construction project in Tustin shall not be operated on or adjacent to said sites outside of the approved hours for construction activity. As stated above, noise impacts associated with construction activities are regulated by the City's

The City of Tustin does not have quantifiable construction standards. As such, the Noise study calculated construction noise levels using reference noise level measurements published in the Federal Highway Administration (FHWA) Road Construction Noise Model (RCNM), and applied the Federal Transit Administration (FTA) construction noise level threshold of 80 dBA Leq.

Project construction would occur in a single phase and would have its greatest impact to the single-family residential uses immediately south, which are the nearest sensitive receptors. Table 15 shows the Project construction noise levels at the closest receptor to the south. As shown in the Table, typical construction noise levels would range from approximately 68.6 to 79.5 dBA Leq at the nearest sensitive receptors and would not exceed the FTA's threshold of 80 dBA. Also, as discussed previously in Section 5.13.1, Project construction would be limited to the hours and days set by the City Code. Potential noise impacts from Project construction would be less than significant.

Table 15. Maximum Project Construction Noise Levels at Closest Sensitive Receptor	
Phase	Combined Noise Level (dBA Leq)
Demolition	79.5
Grading	78.1
Building Construction	74.4
Paving	77.7
Architectural Coating	68.6
FTA's Construction Noise Threshold	80.0
Exceeds Applicable Threshold?	No

Although less than significant, Project construction, especially during the demolition and grading phases, could create substantial nuisance noise impacts for the residential uses immediately south of the Project. Standard City conditions of approval require construction projects to demonstrate best management practices when adjacent to noise sensitive uses, such as residential. These practices include such measures as: ensuring all construction equipment is equipped with mufflers, maintained and operated to manufacturer standards; locating construction equipment at the greatest distance possible from noise sensitive uses; limiting haul truck deliveries to the same hours specified for construction equipment; shielding jackhammers, pneumatic equipment and all other portable stationary noise sources to minimize noise impacts to adjacent residential uses; requiring the Project construction manager's direct phone and email contact to be clearly posted on the construction fencing, and designating the construction manager as the primary contact person should noise levels become disruptive to local residents.

Operational Noise: Operation of the Project would result in changes to existing noise levels on and around the Project site by developing new stationary sources

of noise, notably outdoor HVAC equipment, and by Project generated vehicular traffic.

Mechanical Equipment Noise: The nearest HVAC units would be located as close as approximately 45 feet from the nearest residential use to the south. HVAC equipment typically result in noise levels that averages 66 dBA at 3 feet from the source. The Noise Study calculates that at 45 feet, noise from the HVAC equipment would be approximately 42 dBA. The HVAC units would be shielded from the line-of-sight using a parapet wall, which would further reduce potential HVAC noise impacts. Therefore, the HVAC stationary noise levels would not exceed the City's residential exterior daytime noise standard of 55 dBA nor the residential exterior nighttime standard of 50 dBA, and potential noise impacts from Project HVAC equipment would be less than significant.

Traffic Noise: The Project Trip/VMT Analysis, as discussed in Section 5.17, below, finds that the Project would generate approximately 136 daily trips. According to Caltrans, a doubling of Traffic (100 percent increase) on a roadway would result in a barely perceptible increase in traffic noise levels (3 dBA). As a result, the Noise Study finds that project-related increase in traffic volume would be nominal compared to the existing traffic volumes along the surrounding roadways and the Project would not significantly increase the existing traffic noise levels. The Project's operational traffic noise levels would be less than significant.

As discussed in this section, Project impacts relative to noise levels in excess of established standards would be less than significant levels.

- b) *Would the project generate excessive ground borne vibration or groundborne noise levels?*

Less Than Significant Impact. The Noise Impact Study evaluated groundbourne vibration impacts from the Project that could occur during construction and operation in terms of peak particle velocity (PPV). PPV measures the amplitude of the vibration velocity.

Construction Vibration: Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source.

Project construction activities would likely take place as near as approximately 15 feet from the nearest sensitive uses to the south. Table 16, *Project Typical Construction Equipment Vibration Levels*, below, demonstrates expected vibration levels from Project construction equipment at a distance of 15 feet from the source. To evaluate the significance of these vibration levels, the Noise Study applies the FTA Transit Noise and Vibration Impact Assessment Manual vibration threshold of 0.2 inch per second (inch/second) PPV. This threshold is considered the level at which any discernable impacts from vibration would occur. As shown in Table 16, vibration levels from Project construction would be below the 0.2

inch/second PPV threshold. Additionally, groundborne vibration during construction would be a temporary impact and would cease completely when construction ends.

Table 16. Project Typical Construction Equipment Vibration Levels	
Equipment	Approximate peak particle velocity at 15 feet (inches/second)
Large Bulldozer	0.1561
Loaded Trucks	0.1333
Small Bulldozers	0.0053

Operational Vibration: As a single-family residential use, the Project is not expected to generate notable operational vibrations that could adversely impact nearby sensitive uses.

Project impacts relative to generation of excessive ground borne vibration or groundborne noise levels would be less than significant.

- c) *For a project located with 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 located approximately 5 miles to the south. The Project site is not located within the John Wayne Airport noise contours. Additionally, the Project site is not located 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.

5.13.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would result in less than significant noise impacts. As a result, no mitigation is required.

5.14 POPULATION AND HOUSING

POPULATION AND HOUSING. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Induce substantial 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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

5.14.1 ENVIRONMENTAL SETTING

5.14.1.1 Regulatory Setting

Potential population and housing impacts of the Project are reviewed within the context of the following regulatory setting:

State California Department of Housing and Community Development (HCD): HCD formulates guidelines and programs that direct local governments to promote safe, affordable homes and vibrant, inclusive, sustainable communities for all Californians. As part of its mission statement, HCD focuses on:³²

- Increasing the Supply of Affordable Places to Live in California
- Preserving Affordable Homes and Protecting Public Investment.

Authority for HCD's housing guidelines and programs is established in Government Code Title 7, specifically Sections 65580-65889, that requires all local governments to adopt and implement a Housing Element as part of the jurisdiction's General Plan.

State California Department of Finance (DOF) Demographic Research Unit: The Demographic Research Unit uses population data to establish appropriation limitations, distribute various federal program funds, and aid in the planning and evaluation of programs. State agencies and departments, local governments, the federal government, school districts, public utilities, the private sector, and the public use the data.

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³² <https://www.hcd.ca.gov/about/mission.shtml>; accessed June 9, 2026.

Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy: Every four years, SCAG updates the Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as required by federal and state regulations. Connect SoCal offers a long-term vision for addressing the region's transportation and land use challenges and opportunities. Connect SoCal serves as a compass for SCAG's planning and funding programs by defining regional priorities and setting direction. It makes projects eligible for state and federal funding, informs the Regional Housing Needs Assessment and local planning requirements, and clarifies priorities for state and federal advocacy. In addition, Connect SoCal guides project selection for federal funding programs to ensure investments align with regional goals. Adopted on April 4, 2024, Connect SoCal 2024 is the current RTP/SCS for the region, including the City of Tustin, and covers the planning period 2024-2050.

City of Tustin General Plan: Land use policies of the General Plan are contained in the Land Use Element and 2021-2029 Housing Element, and include the following relevant to the Project:

- Land Use Element Goal 3: Ensure that new development is compatible with surrounding land uses in the community, the City's circulation network, availability of public facilities, existing development constraints and the City's unique characteristics and resources.
- Land Use Element Goal 5: Revitalize older commercial, industrial and residential uses and properties.
- Housing Element Goal 1: Adequate Housing Supply.

5.14.1.2 Existing Conditions

According to the State DOF City/County Population and Housing Estimates (1/1/2026), the City of Tustin had a total population of 79,175 with 28,795 total housing units.³³ As of January 2025, the City had an average number of persons per household of 2.84. According to the 2024-2050 RTP/SCS, the City is projected to have 33,800 households (or occupied housing units) by year 2035.

5.14.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project induce substantial 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. Current General Plan Land Use Map designation for the Project site is Professional Office, which allows for a variety of professional office and other supporting uses. The Project would change the site's General Plan Land Use map designation to Planned Community Residential, permitting the development of the proposed 15 single-family housing units. As discussed

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³³ [E-1_2026_InternetVersion.xlsx](#); accessed June 9, 2026.

previously in Section 5.2., the Project's 15 units would result in an estimated population increase of 45 people, which represents approximately 0.3% of anticipated growth in the City. This projected increase in City population from the Project would be nominal.

Additionally, the Project would be located in an infill urbanized site adjacent of existing residential, and already served by existing roadways and infrastructure systems. No infrastructure would be extended to serve areas beyond the Project site, and the Project would not indirectly induce growth. The Project also complies with General Plan Land Use Element Goals 3 and 5 to ensure new development is compatible with surrounding land uses, and to revitalize older commercial properties, and Housing Element Goal 1 for an adequate housing supply. Project impacts relative to inducement of substantial population growth would be less than significant.

- b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The Project site currently contains a commercial/office building with no housing or persons residing on site. The Project would not displace existing people or housing.

5.14.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on population and housing. As a result, no mitigation is required.

5.15 PUBLIC SERVICES

PUBLIC SERVICES. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	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:				
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

5.15.1 ENVIRONMENTAL SETTING

5.15.1.1 Regulatory Setting

Potential public service impacts of the Project are reviewed within the context of the following regulatory setting:

California Building Code (CBC). The 2025 CBC incorporates standards for construction, both new and renovation, and include codes related to building, residential, electrical, mechanical, plumbing, energy, fire and green building. The City of Tustin adopts and implements the CBC through Title 18 of the City Code .

State of California Fire Code (Fire Code): The 2022 Fire Code, as set forth in Sections 13000 et seq. of the California Health and Safety Code, includes regulations concerning building standards (as also set forth in Title 24, Part 9 of the California Code of Regulations, the California Building Code). These regulations address fire protection and notification systems, fire protection devices (such as extinguishers

and smoke alarms), building evacuation and access standards, and fire suppression training.

State Education Code Section 17620: The Code allows school districts to assess fees on new residential and commercial construction within their respective boundaries. These fees can be collected without special city or county approval, to fund the construction of new school facilities necessitated by the impact of residential and commercial development activity. In addition, these fees can also be used to fund the reconstruction of school facilities or reopening schools to accommodate development-related enrollment growth. Fees are collected immediately prior to the time of the issuance of a building permit by the City.

Quimby Act (1975): The Quimby Act allows cities and counties to adopt park dedication standards/ordinances requiring developers to set aside land, donate conservation easements, or pay fees towards parkland. The City of Tustin applies Quimby Act provisions to require dedication and/or reservation of parkland and other public facilities (such as school sites), or a fee in lieu of, or a combination of both, as a condition of new residential development consistent with the Subdivision Map Act and the Quimby Act.

City of Tustin General Plan: Public services policies of the General Plan are contained in the Public Safety and C/OS/R Elements, and include the following policies relevant to the Project:

- Public Safety Goal 5: Reduce the risk to the community's inhabitants from fires or explosions.

Policy 5.2: Encourage the use of fire retardant roofing materials.

Policy 5.4: Enforce building code requirements that assure adequate fire protection.

- Public Safety Goal 6: Stabilize demand for law enforcement services.

Policy 6.1: Provide appropriate levels of police protection within the community.

- C/OS/R Goal 18: Ensure that the recreational goals and policies are pursued and realized in an organized, incremental, and cost effective manner and consistent with the City of Tustin's financial resources and legal authorities and the appropriate responsibilities of other agencies, the private sector, and individual and group users.

Policy 18.5: Conserve the City's Quimby Act authority by utilizing, wherever practicable, the City's broad powers to enact and enforce its General Plan, Specific Plan(s), Redevelopment Plan(s), subdivision ordinance and Zoning Ordinance to secure public and private recreation sites, open space, trails, and other related land use objectives of community planning significance.

5.15.1.2 Existing Conditions

Current public service providers to the City are described below:

Fire Protection Services: Fire protection in the City of Tustin are provided by the Orange County Fire Authority (OCFA) through a contract for services. Within the City, the OCFA provides services from three fire stations:

- OCFA Fire Station #21, located at 1241 Irvine Boulevard, approximately 1.3 miles east of the Project site;
- OCFA Fire Station #37, located at 15011 Kensington Park Drive, approximately 3.7 miles southeast of the Project site; and
- OCFA Fire Station #43, located at 11490 Pioneer Way, approximately 6 miles north east of the Project site.

According to the Table PS-3, Emergency Service Standards, of the Tustin Public Safety Element, OCFA has a standard response time of 5 minutes for 90 percent of incidents related to fire and basic life support emergency medical services, a standard response time of 10 minutes for 90 percent of incidents related to advance emergency medical services.

Police Services: Police services in the City are provided by the Tustin Police Department. Police Department headquarters are located at 300 Centennial Way, approximately one mile southeast of the Project site. The Police Department responsibilities include crime response, traffic control and animal control. According to the Table PS-3, Emergency Service Standards, of the Tustin Public Safety Element, the Police Department has a standard response time of 3.5 minutes for emergency calls and of 13 minutes for non-emergency calls.

School Services: Public school services in the City are provided by the Tustin Unified School District (TUSD), which also serves portions of the City of Irvine and portions of unincorporated areas of Orange County. TUSD has a total of 29 schools including: 16 elementary schools, two Kindergarten through 8th-grade schools, one Kindergarten through 12th-grade online school, 4 middle schools, one 6th-grade through 12th-grade academy, 4 high schools, and one adult education school. The schools closest to the Project site are the Helen Estock and Tustin Connect Elementary Schools (both 0.4 miles east of the Project site), Columbus Tustin Middle School (1.2 miles east of the Project site), and Tustin High School (2 miles southeast of the Project site).

Park and Recreation Services: Park and recreation services in the City are provided by the Tustin Parks and Recreation Department. The Department maintains 19 public parks throughout the City that provide a wide variety of active and passive recreation activities. The parks closest to the Project site are the Peppertree Park, located 0.5 miles southeast of the Project site, and the Columbus Tustin Park, located 0.5 miles east of the site.

Other Public Facilities: Other public services in the City include library services provided by the Orange County Public Library (OCPL), which has 33 branch libraries in 24 incorporated cities and unincorporated areas of Orange County. The OCPL library branch in the City of Tustin is located at 345 East Main Street, approximately one mile southeast of the Project site.

Other municipal services are provided at the Tustin City Hall, located at 300 Centennial Way, approximately one mile southeast of the Project site. At City Hall, residents have access to a range of services including: public works, planning, building, community services, and city management.

5.15.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- 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:*

i) *Fire Protection?*

Less Than Significant Impact. The Project would remove the existing commercial/office building and replace it with 15 single-family units. The residential units would be constructed to the latest fire safety standards of the Fire Code and the CBC, including interior fire sprinklers.

Emergency and fire access to the site would be provided from the Project's 20-foot-wide private drive that would connect to both Yorba Street and Mountain View Drive. As required by City's City Code and the Fire Department, the Project would provide internal access to accommodate emergency vehicles and onsite provide fire suppression facilities (e.g., hydrants and sprinklers). OCFA Fire Station is within 1.3 miles of the Project site, and fire and emergency vehicles from that station would arrive at the Project site within a few minutes times, consistent with the City Public Safety Element Emergency Service Standards.

As discussed previously, fire access to the site would be from the 20-foot drive aisle with full vehicular access from both Mountain View Drive and Yorba Street. OCFA, which provides fire protection services to the City, would use fire trucks and hose pulls to provide fire protection to the Project site. The internal street is not a fire lane and would be accessed via hose pull. (Reference Figure 10. *Fire Protection Service Plan*, in Section 3.5, above.)

The Project's 15 units could increase the City's overall population by 45 persons, which represents approximately 0.3% anticipated growth in the City. Although the City General Plan does not provide service ratios for fire protection services, the nominal population increase created by the Project is not expected to alter OCFA's service ratios or response times. Also, the Project would generate annually recurring revenue to the City in the form of taxes and other miscellaneous charges (e.g., sales tax, property tax, etc.). A portion of such revenue would be available to address costs associated with potential demands for fire services.

The Project would not cause substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which

could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. In addition, by replacing an approximately 54 year old building with new structures built to contemporary fire and building codes, the Project complies with Public Safety Element Goal 5 and Policies 5.2 and 5.4. Project impacts on fire protection facilities and services would be less than significant.

ii) Police Protection?

Less Than Significant Impact. The new units would be constructed to current CBC and Fire Code standards, within contemporary fencing and exterior lighting. Also, as noted previously, the Project's 15 units would represent about 0.3% of anticipated growth in the City. Although the City General Plan does not provide service ratios for police services, the nominal population increase created by the Project is not expected to alter police service ratios or response times.

Additionally, the Project would generate annually recurring revenue to the City in the form of taxes and other miscellaneous charges (e.g., sales tax, property tax, etc.). A portion of such revenue would be available to address costs associated with potential demands for police services.

The Project would not cause substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police 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. In addition, by providing tax revenue to offset Project generated demand for police services, the Project complies with Public Safety Element Goal 6 and Policy 6.1. Project impacts relative to police facilities and services would be less than significant.

iii) Schools?

Less Than Significant Impact. Per California Government Code (CGC), the Project would be subject to the payment of school impact fees (Section 53080, CGC). As authorized under Section 17620(a) of the California Education Code and Section 65995(b) of the CGC, local school districts are authorized to impose and collect school "impact fees" for all residential and non-residential development activities that occur within their jurisdiction to off-set the additional costs associated with the new students that result directly from the construction of new homes. Payment of school impact fees constitutes full mitigation for the school impacts associated with new residential development. Project impacts relative to school facilities and services would be less than significant.

iv) Parks?

Less Than Significant Impact. As discussed previously, the Project is estimated to result in 15 new residential units. Development of these units would be subject to the City Quimby fees and City Code 9331 parkland in lieu fees, which are established to provide for residential development's fair share of park facilities. With the payment of applicable parkland fees, the Project complies with C/OS/R Element Goal 18 and Policy 18.5.

The Project would not cause substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable parkland ratios. Project impacts relative to park facilities or services would be less than significant.

v) Other Public Facilities?

Less Than Significant Impact. Public facilities and services such as libraries and other municipal services are typically funded through user fees, property tax or sales tax revenues to which the future Project residents would contribute. Project impacts relative to other public facilities and services, such as libraries would be less than significant.

5.15.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would result in less than significant impacts on public services. As a result, no mitigation is required.

5.16 RECREATION

RECREATION.				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	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?			X	
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

5.16.1 ENVIRONMENTAL SETTING

5.16.1.1 Regulatory Setting

Potential recreation impacts of the Project are reviewed within the context of the following regulatory setting:

City of Tustin General Plan: Recreation policies of the General Plan are contained in the C/OS/R Element, and include the following policies relevant to the Project:

- C/OS/R Goal 18: Ensure that the recreational goals and policies are pursued and realized in an organized, incremental, and cost effective manner and consistent with the City of Tustin's financial resources and legal authorities and the appropriate responsibilities of other agencies, the private sector, and individual and group users.

Policy 18.5: Conserve the City's Quimby Act authority by utilizing, wherever practicable, the City's broad powers to enact and enforce its General Plan, Specific Plan(s), Redevelopment Plan(s), subdivision ordinance and Zoning Ordinance to secure public and private recreation sites, open space, trails, and other related land use objectives of community planning significance.

5.16.1.2 Existing Conditions

Existing uses on the Project site consist of a commercial/office building, and ancillary parking and landscape. There are no existing recreational facilities on the site.

5.16.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- 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 discussed in Section 5.15.2 of this Initial Study, new development in the City is charged Quimby fees directed toward new or upgraded park and recreational facilities. Payment of Quimby fees and City Code 9331 parkland in lieu fees would off-set the Project's incremental demand for park facilities, and comply C/OS/R Element Goal 18 and Policy 18.5. In addition, public park and recreational facilities are also funded through user fees, property tax or sales tax revenues to which the future Project residents would contribute. These fees can reasonably be expected to offset the impact of the proposed Project 15 residential units on City recreational facilities and services.

Project impacts relative to substantial physical deterioration of parks or other recreational facilities would be less than significant.

- 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?*

No Impact. Each of the proposed 15 residential units would have a private yard. The potential environmental impacts of these private yards are evaluated as part of the Project within this Initial Study and are not found to have a significant effect on the environment. The Project does not propose new or expanded recreational facilities. Project impacts relative to construction or expansion of recreational facilities which might have an adverse physical effect on the environment would not be significant.

5.16.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would result in no or less than significant impacts on recreation. As a result, no mitigation is required.

5.17 TRANSPORTATION

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

5.17.1 ENVIRONMENTAL SETTING

5.17.1.1 Regulatory Setting

State Senate Bill (SB) 743: SB 743 mandates that Vehicle Miles Travelled (VMT) replace Level of Service (LOS) as the transportation metric under CEQA. Pursuant to CEQA guidelines, Section 15064.3, VMT is the most appropriate measure of transportation impacts; and Section 15064.3 subdivision (b) outlines the criteria for analyzing transportation projects. However, SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., the general plan), studies, or ongoing network monitoring.

City of Tustin General Plan: Policies related to transportation are provided in the Circulation Element of the General Plan, and include the following goals relevant to the Project:

- Circulation Element Goal 1: Provide a system of streets that meets the needs of current and future inhabitants and facilitates the safe and efficient movement of people and goods throughout the City consistent with the City's ability to finance and maintain such a system.

Policy 1.10: Require that proposals for major new developments include a future traffic impact analysis which identifies measures to mitigate any identified project impacts.

Policy 1.11: Encourage new development which facilitates transit services, provides for non-vehicular circulation and minimizes vehicle miles traveled.

- GOAL 6: Increase the use of non-motorized modes of transportation.

5.17.1.2 Existing Conditions

The Project site is currently developed with a commercial/office building and parking lot. There are currently four driveways providing direct access to the existing parking lot, two located along Yorba Street and two along Mountain View Drive

Public transit service in Tustin is provided by Orange County Transportation Authority (OCTA), and includes local fixed-route bus service, commuter bus service, and paratransit services. The OCTA fixed-route bus service closest to the Project site is the #71 Yorba Linda - Newport Beach line that has a bus stop located at West 1st Street and Yorba Street, less than 0.25-mile from the Project site.

The City Master Bikeway Plan depicts designated bikeways within the City. There are no designated bikeways adjacent to the Project site. However, bicycles can travel along the public streets adjacent to the site, including Irvine Boulevard, Yorba Street and Mountain View Drive.

Public sidewalks are provided along the streets adjacent to the Project site, including Irvine Boulevard, Yorba Street and Mountain View Drive.

5.17.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Transportation section is based on the "17332 Irvine Boulevard Residential Project Trip Generation & VMT Analysis/Screening, City of Tustin, California," prepared by MAT Engineering Inc., dated May 19, 2026 (Trip/VMT Analysis), and contained as Appendix H to this Initial Study.

- a) *Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

No Impact. As discussed above, Project site is less than 0.25 miles from the two nearest bus routes, and bicycle and pedestrian access are available from the adjacent public roadways: Irvine Boulevard, Yorba Street and Mountain View Drive.

The Project would provide a 20-foot wide drive aisle, connecting via a single driveway from Mountain View Drive and to Yorba Street. The drive aisle would be privately owned and maintained by the Project's homeowners' association. Pedestrian and bicycle access from the Project also would be available from the private drive aisle, allowing Project residents direct access to the public sidewalks and streets along both Mountain View Drive and Yorba Street.

In order to determine potential Project vehicle trip impacts on adjacent roadways, the Trip/VMT Analysis calculated expected Project traffic based on the Institute of Transportation Engineers (ITE) trip generation rates, which is an industry

standard for calculating trips associated with land uses. The Trip/VMT Analysis determined that, without taking any credit for the existing site uses which would be displaced, the Project would generate approximately 136 daily trips which include approximately 11 AM peak hour trips and approximately 14 PM peak hour trips. The City utilizes a threshold of 50 peak hour trips in determining whether a project-specific traffic impact analysis is required. Because the Project is expected to generate a low number of trips (less than 50 peak hour trips), no Project specific traffic impact study is required. Also, the Trip/VMT Analysis found that the Project would not result in an adverse level of service impact and operations on the surrounding roadway system.

The proposed Project would not conflict with circulation or mobility plans related to transit, bikeways or pedestrian movement. The Project would also be consistent with the General Plan goals and Policies outlined in Section 5.17.2: the Project has a low vehicular trip generation and does not require a traffic impact analysis.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. The Trip/VMT Analysis included a review of the City VMT screening thresholds to identify whether the Project would be presumed to have a less than significant VMT impact, based on any of the following established screening criteria:

- Is the project 100% affordable?
- Is the project within ½ mile of a qualifying transit (defined as ½ mile of a major transit stop or a high-quality transit corridor)?
- Is the project a local serving land use?
- Is the project net daily drips less than 500 ADT?
- Is the project located within a TAZ that generates VMT below the City thresholds?
- Is the project is located within the City-established low VMT area of the City/

The Trip/VMT Analysis found that the Project meets three of the above VMT screening criteria:

- The project generates less than 500 daily trips (without taking credit for the existing displaced use);
- The project is located within a TAZ that generates VMT below the City thresholds; and
- The project is located within the City-established low VMT area of the City.

The Project has a less than significant VMT impact, and does not conflict nor is inconsistent with CEQA Guidelines §15064.3, subdivision (b). Impacts would be less than significant.

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

No Impact. The Project proposes to provide vehicular access from both Mountain View Drive and Yorba Street via a 20-foot drive aisle. The drive aisle would be required to comply with all applicable City engineering regulations and standards. The Project would not substantially increase hazards due to a design feature.

d) Result in inadequate emergency access?

No Impact. As discussed previously, fire access to the site would be from the 20-foot drive aisle with full vehicular access from both Mountain View Drive and Yorba Street. OCFA, which provides fire protection services to the City, would use fire trucks and hose pulls to provide fire protection to the Project site. The internal street is not a fire lane and would be accessed via hose pull. (Reference Figure 10. *Fire Protection Service Plan*, in Section 3.5, above.)

Project construction does not propose any road closures that could impair emergency evacuation routes. The Project would not result in inadequate emergency access.

5.17.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would result in no or less than significant impacts on transportation. As a result, no mitigation is required.

5.18 TRIBAL CULTURAL RESOURCES

TRIBAL CULTURAL RESOURCES.				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
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:				
i) 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				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

5.18.1 EXISTING SETTING

5.18.1.1 Regulatory Setting

Potential tribal cultural resource impacts of the Project are reviewed within the context of the following regulatory setting:

State Senate Bill (SB) 18: SB 18, enacted in California in 2004, requires lead agencies to contact and consult with California Native American tribes before adopting or amending a general plan, specific plans, or designating open space in areas that may affect tribal lands or sacred sites. The intent of SB 18 is to establish meaningful consultation between tribal governments and local governments at the earliest

possible point in the planning process and to enable tribes to manage “cultural places.” Cultural places are defined as a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9), or a Native American historic, cultural, or sacred site, which is listed or may be eligible for listing in the California Register, including any historic or prehistoric ruins, any burial ground, or any archaeological or historic site (PRC Section 5097.993). SB 18 sets the tribal consultation period at 90 days.

State Assembly Bill (AB) 52: AB 52, enacted in California in 2015, requires lead agencies who oversee the preparation of an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration to invite are required to consult with local Native American tribes to determine the likelihood of encountering significant tribal cultural resources. Consultation is only required if a tribe has submitted a written request to the lead agency for notice of projects within its traditional territory. Once a lead agency deems a project application complete, it must notify the tribe within 14 days. The tribe then has 30 days from receipt of the notice to request consultation in writing. If the tribe timely requests consultation, the lead agency must begin the process within 30 days. Importantly, consultation must begin prior to the release of a CEQA environmental document and must be conducted in good faith, with the goal of reaching a mutual agreement on mitigation measures to avoid or reduce impacts to tribal cultural resources.

City of Tustin General Plan: The Tustin General Plan does not identify specific tribal resource goals or policies.

5.18.1.2 Existing Conditions

The Project site is currently developed with a commercial/office building, parking lot and decorative landscape. As discussed previously in Section 5.5 of this Initial Study, historical use of the site, dating back at least to 1938, was agriculture. By 1966, the site was cleared and stood as graded vacant land until the existing commercial/office building and parking lot were constructed in 1972. Since then, the Project site has remained relatively unchanged.

As summarized in the SCCIC letter (Appendix D), no archaeological studies have been conducted in the Project area and as a result, no archaeological resources have been identified. SCCIC notes, however, that buried cultural resources could potentially be unearthed during Project grading activities.

Regarding Native American historic archeological resources, two Native American Sacred Lands File search was conducted by the Native American Heritage Commission (NAHC). The first, summarized in a March 19, 2026, NAHC letter (Appendix I), found that the site could contain or be associated with Native American archaeological resources, and recommended that Juaneño Band of Mission Indians Acjachemen Nation - Belardes be contacted for more information regarding these resources. The second Sacred Lands File search, summarized in a March 30, 2026, NAHC letter (Appendix I), did not identify any positive Native American resources. Both NAHC letters provided a consultation list of tribes that are traditionally and culturally

affiliated with the Project site's geographic area, including the Juaneño Band of Mission Indians Acjachemen Nation – Belardes.

5.18.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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. PRC 5020.1(k) defines a "Local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. As discussed previously in Section 5.5 of this Initial Study, a recent City historic resources survey report explored opportunities for expansion of the Cultural Resources District.³⁴ The survey included commercial buildings constructed up 1976. Buildings evaluated under this category would be significant for their association with Tustin's commercial development, or for their association with individuals who played an important role in Tustin's history, or significant as embodiments of an architectural style, type, period, or method of construction. The existing commercial building on the Project site is not associated with an important role in Tustin's history and does not have a historically relevant architectural style. The existing on-site building was not included in the survey, and the Project would not have a significant adverse impact on a state or locally listed historical resource.

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

Less Than Significant Impact with Mitigation Incorporated. Pursuant to SB 18 and AB 52 regulations, the City sent notices to the representatives identified in the NAHC consultation list, including representatives from the following tribes: Juaneño Band of Mission Indians Acjachemen Nation – Belardes; Cahuilla Band of Indians; Gabrieleño Band of Mission Indians - Kizh Nation; Gabrieleño/Tongva San Gabrieleño Band of Mission Indians; Gabrielino Tongva Indians of California Tribal Council; Gabrielino/Tongva Nation; Gabrielino-Tongva Tribe; Juaneno Band of Mission Indians Acjachemen Nation 84A; Morongo Band of Mission Indians; Pala

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³⁴ City of Tustin Citywide Historic Resources Survey Update Report, prepared for City of Tustin, September 27, 2021.

Band of Mission Indians; Santa Rosa Band of Cahuilla Indians; Soboba Band of Luiseno Indians.

The notices, which were sent out on April 6, 2026, informed the tribal representatives about the Project and its ongoing CEQA review, and invited the representatives to contact the City should they wish to consult on potential tribal cultural resources on the Project site. Consistent with SB 18, the time period for tribes to request consultation was set at 90 days, closing on July 6, 2026.

The following tribal representatives contacted the City requesting to consult on potential tribal cultural resources associated with the Project site:

1. Gabrieleño Band of Mission Indians - Kizh Nation: Andy Salas, Chief
2. Juaneño Band of Mission Indians Acjachemen Nation-Belardes: Joyce Perry, Cultural Resource Director
3. Juaneño Band of Mission Indians Acjachemen Nation 84A: Chris Granado, Cultural Resource Director
4. Morongo Band of Mission Indians: Bernadette Ann Brierty, Tribal Historic Preservation Officer.

One other tribal representative also contacted the City, declining consultation: Pala Band of Mission Indians: Shasta C. Gaughen, Tribal Historic Preservation Office.

The City held consultations with each of the four above listed tribes that requested consultation. The tribal representatives provided information regarding their tribal affiliation with the Project area, and requested mitigation to ensure that any potential tribal cultural resources are identified and protected.

To address the tribes requests, mitigation measures are included in the Project as Mitigation Measures TCR-1, TCR-2, TCR-3, TCR-4 and TCR-5. These measures incorporate the requests of the four tribes that participated in the Project's tribal consultation process, and are included in Appendix J of this document. These measures would ensure protection of potential tribal cultural resources during Project ground-disturbing activities. With inclusion of these measures, potential Project impacts relative to tribal resources would be less than significant.

5.18.3 MITIGATION MEASURES

With inclusion of the following general mitigation measures, potential Project impacts related to tribal resources would be reduced to less than significant levels:

Mitigation General TCR-1: General Provisions.

Timing: Throughout tribal consultation process.

Department Responsible: Community Development (Planning and Building Divisions).

A. Interpretation. These general measures are adopted together with, and do not modify the text of, the adopted tribal cultural resource

mitigation measures, except as expressly stated in the precedence provisions below. They do not modify obligations imposed by state law.

B. Definitions. As used in these general measures, "ground-disturbing activity" means any activity that disturbs, moves, or removes soil, surface material, or subsurface material in previously undisturbed native soils or soils containing native material. "Ground-disturbing activity" shall include but not be limited to, demolition, pavement removal, auguring, grubbing, boring, grading, excavation, drilling, and trenching. "Ground-disturbing activity" shall not include minor maintenance activities such as potholing, tree removal, and parking lot maintenance. These general measures do not apply to projects that would only disturb soils made up of artificial fill, as verified by a soils or geotechnical report. "Consulting tribe" means each of the following four tribes, each of which requested consultation with the City regarding the project: (1) the Juaneño Band of Mission Indians, Acjachemen Nation - Belardes, (2) the Juaneño Band of Mission Indians Acjachemen Nation 84A, (3) the Gabrieleño Band of Mission Indians - Kizh Nation, and (4) the Morongo Band of Mission Indians. Actions of the City under these general measures may be taken by the Community Development Director or designee.

C. Applicability. These general measures apply to all ground disturbing activities related to the project development, regardless of whether the disturbance is related to on-site activities or off-site infrastructure.

Mitigation General TCR-2: Tribal Monitoring Coordination.

Timing: Not less than 30 days prior to issuance of the first permit authorizing ground-disturbing activity.

Department Responsible: Community Development (Planning and Building Divisions).

A. Agreements. Not less than 30 days prior to issuance of the first permit authorizing ground-disturbing activity, the Applicant shall make good-faith efforts to execute a monitoring agreement directly with each consulting tribe that has requested monitoring. The monitoring agreement shall address monitor compensation, scheduling, notice, site access, safety requirements, invoicing, and the designation of a primary monitor and up to three backup monitors or contacts.

If the Applicant and a consulting tribe have not executed an agreement after at least three documented attempts by the Applicant, the Applicant shall notify the City. The City shall contact the tribe and make a good-faith effort to facilitate completion of the agreement. Failure to execute a monitoring agreement shall not authorize the Applicant or the City to designate a monitor for the requesting tribe or to substitute another tribe for the requesting tribe.

If an agreement has not been executed after completion of this process, issuance of the permit shall not be delayed solely for that reason. Monitoring shall be governed by the adopted mitigation measures, these general measures, and the approved Implementation Plan. The Applicant shall remain responsible for providing all required notices, allowing access to any monitor designated by

the requesting tribe, and compensating that monitor at a reasonable rate determined in good faith. The Applicant is solely responsible for administering and funding the monitoring arrangements, including monitor compensation, scheduling, and notice.

B. Monitoring. Monitoring for each consulting tribe that has requested monitoring shall be performed by a monitor designated by that tribe, in accordance with its adopted mitigation measures and its monitoring agreement, if one has been executed. The Applicant shall provide all participating tribes not less than 48 hours' notice of activities requiring monitoring and shall coordinate scheduling, site access, and safety requirements for all monitors.

Each requesting tribe shall designate a primary monitor and may designate up to three backup monitors or points of contact. The applicable monitoring agreement or another written procedure approved by the requesting tribe may establish the permissible methods of contact, the period within which the tribe must confirm that a monitor will be present, and the procedure governing monitor unavailability or nonresponse. If the Applicant timely contacts all persons designated by the tribe, documents those efforts, and no designated monitor confirms availability or appears within the agreed period, ground-disturbing work may proceed only in accordance with the procedure approved by that tribe.

The tribe's monitoring may resume when one of its designated monitors becomes available. A monitor designated by another tribe shall not substitute for the requesting tribe's monitor unless the requesting tribe expressly authorizes that designation in writing. The discovery protections of MM TCR-4 remain in effect at all times, whether or not a monitor is present.

C. Conclusion. Each consulting tribe's monitoring concludes under the monitoring-conclusion provision of that tribe's own adopted measures, or upon its written confirmation that it no longer requests monitoring. Each conclusion shall be documented by the Applicant to the City for MMRP compliance.

D. Precedence. This measure controls over the tribe-specific tribal cultural resource measures only as to the scheduling and notice of monitored activities and the implementation of any backup-monitor, unavailability, or nonresponse procedure approved in writing by the affected tribe. Nothing in this measure authorizes the Applicant or the City to substitute one tribe or one tribe's monitor for another tribe or its designated monitor without the affected tribe's written authorization.

Mitigation General TCR-3: Tribal Cultural Resources Implementation Plan.

Timing: Prior to issuance of the first permit authorizing ground-disturbing activity.

Department Responsible: Community Development (Planning and Building Divisions).

A. Preparation and Approval. Prior to issuance of the first permit authorizing ground-disturbing activity, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification

Standards to prepare a Tribal Cultural Resources Implementation Plan. The Applicant shall transmit the draft plan to each consulting tribe for a 30-day comment period and provide all comments, with responses, to the City with the final plan. Any conflicting tribal comments concerning archaeological, technical, or field-implementation matters shall be resolved by the archaeologist, within the scope assigned to the archaeologist by these general measures, through the responses to comments. The City shall approve the final plan in writing, within 14 days of receipt of the final plan, upon confirming that it is consistent with the adopted mitigation measures. The Implementation Plan serves as a plan-level document for implementing adopted mitigation measures requested by consulting tribes. In the event of a conflict, the adopted mitigation measures control over the Implementation Plan, and the Implementation Plan controls over the tribal monitoring agreements except for any backup-monitor, unavailability, or nonresponse procedure approved in writing by the affected tribe under MM General TCR-2.

B. Contents. The Implementation Plan shall establish the operational details for implementing the adopted mitigation measures. The Plan shall include:

1. Pre-construction coordination, with a joint meeting as the default and any consulting tribe entitled to elect a separate session covering the same subjects. Either format satisfies that tribe's meeting requirement, and neither delays permits or ground disturbance where a tribe elects not to participate after reasonable notice.
2. Cultural resources sensitivity training for construction personnel, conducted by the qualified archaeologist with the consulting tribes invited to participate, satisfying all tribe-specific training requirements.
3. Accommodation of tribal ceremonies or blessings when requested by a consulting tribe.
4. The activities requiring monitoring and the scheduling and notice procedures under MM TCR-2.
5. A communication protocol identifying the Applicant's single point of contact, the contact designated by each consulting tribe for receipt of notices, the notification sequence for each type of event, and the circumstances in which City notification is required. Notice to a tribe's designated contact is effective notice to that tribe, and each consulting tribe is responsible for keeping its designation current. For human remains, the protocol shall identify the County Coroner and the sequence required by Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.
6. Discovery-securing, documentation, and reporting procedures.

7. The significance-screening criteria consistent with Public Resources Code Sections 21074 and 5024.1(c), the objection period, and the expedited-determination timeline under MM TCR-4.
8. The method for computing the time periods established by these general measures, including whether the periods stated in hours or days include weekends and holidays.

C. Confidentiality. The Applicant, the qualified archaeologist, and the City shall handle information regarding the nature, content, and location of tribal cultural resources, including monitoring logs, discovery reports, and final monitoring and mitigation summary reports, as confidential to the maximum extent permitted by law, including Public Resources Code Section 21082.3(c) and Government Code Section 65352.4 et seq., and submitted to the City under confidential cover.

Mitigation General TCR-4: Unanticipated Discoveries.

Timing: If a potential tribal cultural resource is discovered.

Department Responsible: Community Development (Planning and Building Divisions).

A. Work Stoppage. If a potential tribal cultural resource is discovered, work shall stop within 50 feet of the discovery and the Applicant shall secure the area. The qualified archaeologist may modify the buffer in the archaeologist's professional judgment only after the archaeologist has consulted with the participating tribal monitors, except where immediate action is necessary for safety. After consultation with the participating tribal monitors, or after any immediate action necessary for safety, the archaeologist shall provide the consulting tribes and the City with written notice stating the basis for the modification. Within 24 hours of the discovery, the Applicant shall notify the qualified archaeologist, all consulting tribes, and the City of the discovery, including its location, a general description, and confirmation that work has stopped within the avoidance area. Work may continue outside the avoidance area. This paragraph controls over any inconsistent tribe-specific requirement concerning the distance or modification of a discovery buffer, including 84A Measure No. 3, Morongo CR-6, Belardes TCR-2, and Kizh TCR-2.

B. Inspection. Each consulting tribe shall have the opportunity to inspect the discovery and provide recommendations within the period specified in the Implementation Plan, which shall be not less than 48 hours from the notice provided under paragraph A.

C. Significance. The qualified archaeologist, in consultation with the tribal monitors present, shall determine whether the discovery is a significant tribal cultural resource. The archaeologist shall apply the significance criteria in the Implementation Plan. A tribal monitor's authority to identify a discovery and stop work under a mitigation measure is preserved. This measure provides the only process for assessing a discovery and resuming work, and it controls over any inconsistent provision governing the assessment of a discovery or the resumption of work, including Belardes TCR-2, Kizh TCR-2, 84A Measure No. 3, and Morongo

CR-1 and CR-6, to the extent those provisions assign controlling assessment or work-resumption authority to a particular tribe, tribal monitor, or tribal representative.

D. Release of Non-Significant Discoveries. If the archaeologist determines the discovery is not significant, the archaeologist shall issue a written release stating the basis, provided at the same time to the consulting tribes and the City. The written release begins the objection period, which shall be established in the Implementation Plan and shall be not less than 48 hours. The objection period shall not expire before the inspection period under paragraph B expires. Work in the avoidance area may resume upon expiration of the objection period, unless a tribal monitor or consulting tribe objects in writing stating its basis.

E. City Determination on Objection. Upon a timely objection, the avoidance area shall remain closed. The City shall determine whether the discovery is a significant tribal cultural resource under Public Resources Code Section 21074. The City shall make the determination on the expedited timeline in the Implementation Plan, which shall be not more than 15 days after the objection. If the City determines that the discovery is not a significant tribal cultural resource, work in the avoidance area may resume. If the City does not make the determination within that period, the discovery shall be treated as a significant tribal cultural resource and paragraph F shall apply.

F. Treatment of Significant Discoveries. For a significant tribal cultural resource, preservation in place is the preferred treatment, consistent with Public Resources Code Sections 21083.2(b) and 21084.3. If preservation in place is infeasible, the qualified archaeologist shall implement a treatment plan prepared in consultation with the consulting tribes, addressing both scientific and cultural values. Work in the avoidance area may resume only after the qualified archaeologist confirms in writing, with copies to the consulting tribes and the City, that the treatment plan has been implemented.

G. Disposition. This paragraph applies to recovered resources other than human remains and associated grave goods governed by Paragraph H. A consulting tribe asserts an interest in a recovered resource by written notice provided within the inspection period under paragraph B. If only one consulting tribe asserts an interest in a recovered resource, disposition shall be governed by that tribe's adopted measure. If more than one tribe asserts an interest, the qualified archaeologist shall convene the interested tribes. If the interested tribes do not agree within the timeframe in the Implementation Plan, the qualified archaeologist shall not determine the validity or priority of any tribe's cultural affiliation or cultural claim. After considering the information and recommendations provided by the interested tribes, the qualified archaeologist shall determine the manner of disposition that best implements paragraph F and the other applicable requirements of these mitigation measures. The determination shall be provided to the interested tribes and the City under confidential cover and implemented by the Applicant. Where more than one consulting tribe asserts an interest in a recovered resource, this paragraph controls over any inconsistent provision governing the recovery, custody,

retention, reburial, curation, treatment, or final disposition of that resource, including Belardes TCR-2, Kizh TCR-2, 84A Measures Nos. 3, 8, 9, and 11, and Morongo CR-6.

H. Human Remains. If human remains are discovered, all ground-disturbing activity shall immediately cease within 50 feet of the discovery and within any larger area required by Health and Safety Code section 7050.5. The qualified archaeologist may modify the 50-foot buffer in accordance with paragraph A, but may not reduce the stop-work area below the area required by section 7050.5. This paragraph controls over any inconsistent buffer distance or stop-work area in the tribe-specific mitigation measures, including 84A Measure No. 4 and Morongo CR-7(a). The discovery and treatment of human remains shall otherwise be governed by Health and Safety Code section 7050.5 and Public Resources Code section 5097.98, and the discovery shall be kept confidential. The treatment and disposition of Native American human remains and associated grave goods shall be determined through the Most Likely Descendant process prescribed by state law, which controls over any conflicting provision, and the discovery shall be kept confidential. The treatment and disposition of Native American human remains and associated grave goods shall be determined through the Most Likely Descendant process prescribed by state law, which controls over any conflicting provision. No photograph, video, or other image of human remains or associated grave goods shall be taken, retained, or disclosed except by the Coroner as required or permitted by law. This paragraph controls over any inconsistent tribe-specific requirement concerning photography or other imaging of human remains or associated grave goods.

Mitigation General TCR-5: Roles.

Timing: Throughout tribal consultation process.

Department Responsible: Community Development (Planning and Building Divisions).

A. Applicant. The Applicant is responsible for all direct coordination with the consulting tribes, including agreements, scheduling, notices, compensation, monitoring logs, discovery notifications, and all documentation required by the adopted measures and the Implementation Plan. The Applicant shall maintain compliance records, including the final monitoring and mitigation summary report, available to the City upon request.

B. Archaeologist. The qualified archaeologist is retained and compensated by the Applicant and shall exercise independent professional judgment, within the scope assigned to the archaeologist by these general measures, in making determinations, releases, confirmations, and resolutions. If the qualified archaeologist ceases to serve, the Applicant shall retain a replacement meeting the Secretary of the Interior's Professional Qualification Standards within 14 days, and ground-disturbing activities requiring the archaeologist's presence under any adopted measure shall not proceed until the replacement is retained.

C. City. Consistent with Public Resources Code Section 21081.6, the City verifies implementation of the adopted measures through the MMRP. During ground-disturbing activities, the City's role is limited to approval of the

Implementation Plan, determinations on contested significance under MM TCR-4, receipt of releases, determinations, and compliance documentation, and any action required by the MMRP or by law. Routine coordination occurs directly among the Applicant, the qualified archaeologist, and the consulting tribes.

D. Final Reports. Any final archaeological or cultural resources report shall be provided to the consulting tribes for a 30-day review and comment period before finalization and submission. Tribal approval of the final report is not required. This paragraph controls over 84A Measures Nos. 7 through 11, and any other inconsistent tribe-specific provision, only to the extent the provision requires tribal approval or acceptance of a final report.

5.19 UTILITIES AND SERVICE SYSTEMS

UTILITIES AND SERVICE SYSTEMS. Would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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?				X
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

5.19.1 EXISTING SETTING

5.19.1.1 Regulatory Setting

Potential utilities and service systems impacts of the Project are reviewed within the context of the following regulatory setting:

National Pollution Discharge Elimination System Permit (NPDES): The NPDES permit system was established in the Federal Clean Water Act to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to

surface waters of the U.S. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

California Urban Water Management Planning Act: Section 10610 of the California Water Code establishes the Urban Water Management Planning Act. The Act states that every urban water service provider that serves 3,000 or more customers or that supplies over 3,000 acre feet (af) of water annually should prepare an Urban Water Management Plan (UWMP) every five years. The goal of a UWMP is to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years.

California Integrated Waste Management Act of 1989: This legislation requires each California city and county to divert 50 percent of its solid waste through source reduction, recycling, and composting. This ordinance requires recycling collection and loading areas in all development projects. Implementation of this legislation is the responsibility of the California Integrated Waste Management Board (CIWMB).

City of Tustin Urban Water Management Plan: The City 2020 Urban Water Management Plan (UWMP) is the City's comprehensive plan for supplying water over a 20-25 year horizon. The UWMP provides an assessment of the present and future water supply sources and demands within the City's service area.

City of Tustin General Plan: Utilities and service policies of the General Plan are contained in the C/OS/R and Land Use Elements, and include the following relevant to the Project:

- C/OS/R Element Goal 5: Protect water quality and conserve water supply.
- C/OS/R Element Goal 10: Reduce solid waste produced within City.
- Land Use Element Goal 8: Ensure that necessary public facilities and services should be available to accommodate development proposed on the Land Use Policy Map.

Policy 8.6: Encourage planned improvements to electricity, natural gas, and communication service systems.

5.19.1.2 Existing Conditions

Existing utilities and service systems available in the City and to the Project site include:

Water: Domestic water is supplied by the City of Tustin, from both groundwater and imported water sources. The groundwater is pumped from the City's 14 groundwater wells. Imported water from the Colorado River is provided by the Metropolitan Water District of Southern California.³⁵ The City's UWMP indicates that through its groundwater and imported sources, the City has supply capabilities that would be

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³⁵ [Water Supply & Quality | Tustin, CA](#); accessed April 21, 2026.

sufficient to meet demands from 2025 to 2045 under the normal, single dry-year, and multiple dry years.

Wastewater: Wastewater services are provided to the City by the East Orange County Water District (EOCWD). The EOCWD operates a gravity collection system that conveys wastewater to Orange County Sanitation District (OC San) wastewater treatment plants, which are located in Fountain Valley and Huntington Beach.

Stormwater Drainage: As discussed in Section 5.10.1.2 of this Initial Study, concrete valley gutters collect the majority of the existing runoff and drain above ground to Mountain View Drive, over the sidewalk and into the curb and gutter. The closest public drainage facility to the site are catch basin located on the south and north sides of Irvine Boulevard approximately 1,000 feet east of the site. Additionally, there is a public storm drain approximately 700 feet to the south in West First Street.

Electrical Service, Natural Gas, Telecommunications: SCE currently provides electric service to the site through underground lines along Yorba Street and Mountain View Drive. There is also existing SCE easements and two 38' tall utility poles along the Project site's southern boundaries, which provide electricity to properties located south of the site. Southern California Gas currently provides natural gas service to the site, and Frontier and AT&T provide cable service.

Solid Waste: The City of Tustin contracts with CR&R Incorporated (CR&R) for trash and recycling services throughout the community. CR&R collects and recycles trash through its network of material recovery facilities. The two closest landfills to the Project site are the Frank R. Bowerman Landfill in Irvine and the Olinda Alpha Sanitary Landfill in Brea.

5.19.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Less Than Significant Impact. An assessment of utilities and services required by the Project is provided in a Preliminary Due Diligence Report prepared for the Project (reference Appendix H). This report identifies the existing utilities available to the Project site and the estimated Project utility demands.

Water: There is an existing 8-inch water main line located in Irvine Boulevard on the north half of the street; an existing 8-inch water main located in Yorba Street on the east half of the street; and an existing 6-inch C water main located in Mountain View Drive on the east half of the street. Water is currently provided to the Project site via a lateral and meter located in the Yorba Street sidewalk.

The Preliminary Due Diligence Report found that water demand for the Project is not expected to be significant because of its relatively small size, i.e., 15 residential units. The Project would connect its domestic water system to the

existing water main on Mountain View Drive. The existing 6-inch line in Mountain View Drive is expected to meet the Project demands. However, should additional water flow capacity be required, the Project could alternatively connect to the existing 8-inch main in Yorba Street.

The Project is expected to individual meter each unit. Regarding the Project's fire sprinkler system, the Project is expected to require an NFPA 13D sprinkler system, which allows for connections to the potable water supply, so a separate water supply line is not expected.

As noted above, The City's UWMP indicates that the City has supply capabilities that would be sufficient to meet demands from 2025 to 2045 under the normal, single dry-year, and multiple dry years. The Project would not impact the existing City water supply system and would not require relocation or construction of new or expanded public water facilities.

Wastewater: Existing wastewater lines adjacent to the Project site include 8-inch sanitary sewer lines located on the west in Yorba Street, on the east in Mountain View Drive and on the north in Irvine Boulevard.

The Preliminary Due Diligence Report found that there are no known wastewater capacity issues in the Project area.³⁶ Project sewer lines are proposed to connect to the existing lines on Mountain View Drive east of the Project site. The sewer line at this location is about 7.5 feet deep, and with the site's gradual drainage to the east, would allow the Project to gravity drain to the existing 8-inch on Mountain View Drive. The Project would not impact the existing City wastewater collection or treatment system and would not require relocation or construction of new or expanded public wastewater facilities.

Stormwater Drainage: The Project would retain the existing site drainage conditions, collecting and filtering runoff before releasing it to the curb and gutter system on Mountain View Drive. As discussed previously (Section 5.10.1.2), the Project would not impact the existing City storm drainage system and would not require relocation or construction of new or expanded public storm drainage facilities.

Electrical Service, Natural Gas, Telecommunications: The Project would connect to the existing electric and telecommunication lines on either Yorba Street or Mountain View Drive. The Project would be fully electric and would not require a natural gas connection. The Project would not impact the existing City electrical, natural gas or telecommunication facilities.

Project impacts would be less than significant relative to the requirement to relocate or construct new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

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³⁶ Preliminary Due Diligence Report: 17332 Irvine Blvd, Tustin, California; prepared by Advanced Civil Group, Inc., dated June 25, 2026; contained in Appendix H of this Initial Study.

- b) *Would the Project 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. As discussed above, the City's UWMP indicates that the City has supply capabilities that would be sufficient to meet demands from 2025 to 2045 under the normal, single dry-year, and multiple dry years. The Project would not impact the existing City water supply system and would not require relocation or construction of new or expanded public water facilities.

Future Project residents would be required to pay water connection and service fees to off-set the Project's incremental demand for waste services and facilities. The Project impacts would be less than significant relative to sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years.

- c) *Would the Project 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. As discussed above, the EOCWD is responsible for collecting City wastewater, and then conveys it to two OC San wastewater treatment plants: Reclamation Plant No. 1, located in Fountain Valley with a capacity of 320 MGD, and Reclamation Plant No. 2 located in Huntington Beach with a capacity of 312 MGD. The EOCWD 2025 Urban Water Management Plan, which projects district water and waste water demands through year 2050, does not identify any current or projected deficiencies in wastewater treatment capacity.

The Preliminary Due Diligence report assessed Project wastewater generation and found that the existing EOWCD appears to have adequate capacity for the Project's 15 residential units. Future Project residents would be required to pay water connection and service fees to off-set the Project's incremental demand for wastewater services and facilities. Potential adverse impacts relative to wastewater treatment capacity would be less than significant.

- d) *Would the Project 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. As discussed previously, the City contracts with CR&R for trash and recycling services, and the closest landfills that accept City solid waste are the Frank R. Bowerman and Olinda Alpha. The Frank R. Bowerman Landfill, which has a maximum permitted daily refuse is 11,500 tons, and consists of approximately 725 acres with about 534 acres to be used for waste disposal. The Olinda Alpha Landfill has a maximum permitted daily refuse

is 8,000 tons, and consists of approximately 565 acres with about 453 acres to be used for waste disposal.³⁷

The Project is a small infill development, and its 15 units would represent about 0.3% of anticipated growth in the City. Future Project residents would be required to pay solid waste collection fees to off-set the Project's incremental demand for solid waste services and facilities. The Project impacts relative to solid waste generation and capacity and solid waste reduction goals would be less than significant.

- e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would add 15 new residential units to the site, resulting in an increased amount of solid waste, both during construction and operation. All solid waste-generating activities within the City are subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that require demolition and construction activities to recycle or reuse a minimum of 75 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Through the City's Building and Safety Division review and inspection process, Project construction would comply with these applicable state regulations.

During Project operation, future residents would participate in the City's recycling program provided through its contract with CC&R. Future Project residents would be required to pay refuse collection fees to off-set the Project's incremental demand for solid waste and recycling services. Project impacts relative to compliance with solid waste regulations would be less than significant.

5.19.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would result in less than significant impacts related to utilities and service systems. As a result, no mitigation is required.

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³⁷ <https://oclandfills.com/landfills/active-landfills>; accessed April 29, 2026.

5.20 WILDFIRE

WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?				X
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?				X
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?				X

5.20.1 EXISTING SETTING

5.20.1.1 Regulatory Setting

Potential wildlife impacts of the Project are reviewed within the context of the following regulatory setting:

State of California Public Resources Code 4201-4204 – Fire Hazard Safety Zone: Major destructive fires in the state prompted this legislation to require mapping of fire hazard severity zones.

City of Tustin General Plan: The Tustin General Plan does not identify specific wildfire goals or policies.

5.20.1.1 Existing Conditions

The Project site and surrounding areas are developed with urban uses.

5.20.2 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) *Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*

No Impact. According to the California Fire Hazard Severity Zones mapping, neither the Project site nor surrounding area are within a Very High Fire Hazard Zone.³⁸ Vehicular access to the Project site would be provided from a 20-foot wide private drive that would connect to both Yorba Street and Mountain View Drive. As required by City's City Code and the Fire Department, the Project would provide internal access to accommodate emergency vehicles and onsite provide fire suppression facilities (e.g., hydrants and sprinklers). The Project would not substantially impair an adopted emergency response or 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?*

No Impact. The Project would clear the site of a 1972 building, and construct a new residential development built to contemporary Building and Fire Code standards. By so doing, the Project could reduce the fire risks on the site. The Project would not 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?*

No Impact. The Project site is within an urbanized area, and fronts on Irvine Boulevard, a major arterial with direct access from Yorba Street and Mountain View Drive. As discussed, above, the proposed development would clear the site of a 1972 building, and construct a new residential development built to contemporary Building and Fire Code standards. By so doing, the Project could reduce the fire risks on the site. The Project would not require installation or maintenance of roads, fuel breaks, emergency water sources, power lines or other utilities that could exacerbate fire risk.

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

No Impact. As discussed in Section 5.10 of this Initial Study, the Project site is not within a flood risk or landslide prone area. The Project would redevelop the site with new residential development built to current CBC and Fire Code

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³⁸ [Fire Hazard Severity Zones | OSFM](#); accessed April 9, 2026.

standards. The Project would be located on an infill site surrounded by urban development, and is not within a designated high fire risk area. The Project is not expected to expose people or structures to significant risks related to flooding or landslides.

5.20.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts related to wildfire. As a result, no mitigation is required.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

MANDATORY FINDINGS OF SIGNIFICANCE.				
Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	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, reduce the number or restrict the range of a rare or an endangered threatened species, or eliminate important examples of the major periods of California history or prehistory?		X		
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)?			X	
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

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

Less Than Significant with Mitigation Incorporated. The Project would not have substantial impacts on special status species, stream habitat, and wildlife dispersal and migration. Nor would the Project affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. However, there is potential for nesting birds to

be impacted during the clearing of existing on-site trees, and Mitigation Measure BIO-1 is added to the Project to ensure compliance with MBTA and CFW regulations to ensure nesting birds are protected during Project development.

There are no designated historic resources on or in the vicinity of the Project site. There is potential for inadvertent discoveries of archaeological and Native American archeological resources during project grading. Potential impacts to archeological, paleontological and Native American resources would be mitigated by Mitigation Measures CUL-1 and TRC-1 through TRC-5. With implementation of these mitigation measures, the Project's Mandatory Finding of Significance relative to degrading the quality of the environment would be less significant.

- 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 the past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The Project would result in potential significant impacts relative to biological resources (nesting birds), cultural resources (archaeological cultural resources), hazards and hazardous materials (lead based paint and asbestos containing materials), and tribal cultural resources. Each of these potential impacts would be site specific, and mitigation measures are included in the Project to reduce these impacts to less than significant levels. The Project's Mandatory Finding of Significance relative to contribution to cumulative impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. The Project could result in potential significant impacts relative to hazards and hazardous materials that are associated with possible ACMs and LBPs from existing building materials. Mitigation Measures HAZ-1 and HAZ-2 are provided to reduce these impacts to less than significant levels. The Project's Mandatory Finding of Significance relative to a substantial adverse effect on human beings would be less than significant with mitigation incorporated.

SECTION 6.0 – LIST OF PREPARERS

6.1 PREPARATION – ENVIRONMENTAL DOCUMENT

- Joann Lombardo, Comprehensive Planning Services

6.2 PREPARATION - AIR QUALITY / GHG ANALYSIS

- Alex Tabrizi, PE, TE, MAT Engineering, Inc.

6.3 PREPARATION - TRAFFIC ANALYSIS

- Alex Tabrizi, PE, TE, MAT Engineering, Inc.

6.4 PREPARATION - NOISE ANALYSIS

- Alex Tabrizi, PE, TE, MAT Engineering, Inc.

SECTION 7.0 – LIST OF ACRONYMS AND ABBREVIATIONS

The following lists acronyms and technical abbreviations that appear in this document by alphabetical order:

- AB – Assembly Bill
- ACM - Asbestos-Containing Material
- Af – Acre Feet
- AHERA - Asbestos Hazard Emergency Response Act
- Amsl - above mean sea level
- AAQS - Ambient Air Quality Standards
- AQMP - Air Quality Management Plan
- ASTM - American Society for Testing and Materials
- BMPs - Best Management Practices
- CAAQS - California Ambient Air Quality Standards
- CalEEMod - California Emissions Estimator Model Version 2022.1
- Caltrans - California Department of Transportation
- CARB - California Air Resources Board
- CBC – California Building Codes
- CCR - California Code of Regulations
- CFW – California Fish and Wildlife
- CEQA - California Environmental Quality Act
- CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
- CESA - California Endangered Species Act
- CGC - California Government Code
- CHSC - California Health and Safety Code
- CH₄ – Methane
- CLRRRA - California Land Reuse and Revitalization Act
- CO - Carbon Monoxide
- CO₂ – Carbon Dioxide
- CO_{2e} – Carbon Dioxide Equivalents
- CNEL - Community Noise Equivalent Level
- CVC - California Vehicle Code
- CWA – United States Clean Water Act
- cy – cubic yards
- DAMP - County of Orange Drainage Area Management Plan
- dB – Decibels
- dBA – Average (A-weighted) Decibels
- DTSC – California Department of Toxic Substances Control
- EIR - Environmental Impact Report
- EPA - United State Environmental Protection Agency
- ESA - Phase I and II Environmental Site Assessment
- FESA - Federal Endangered Species Act
- FMMP - California Department of Conservation Farmland Mapping and Monitoring Program
- GHG - Greenhouse Gas Emissions
- HCD - State of California Department of Housing and Community Development
- lbs – Pounds

- Ldn – Quiet Time Noise Measurement
- LEQ – Noise Energy Level Measurement
- LID - Preliminary Low Impact Development
- LOS - Level of Service
- LST - Localized Significance Threshold
- MBTA - Migratory Bird Treaty Act
- mgd – Millions of gallons per day
- MS4 – Regional Orange County Basin Municipal Storm Water Permit
- NAHC - Native American Heritage Commission
- NAAQS - National Ambient Air Quality Standards (NAAQS)
- NHPA - Federal National Historic Preservation Act of 1966
- NOx - Nitrogen Oxide
- NPDES - National Pollution Discharge Elimination System
- NRHP - National Register of Historic Places
- N2O – Nitrous Oxide
- OCFA - Orange County Fire Authority
- OPR - California Governor’s Office of Planning and Research
- OSHA - United States Occupational Safety and Health Administration
- PM-10 - Respirable 10-Micron Diameter Particulate Matter
- PM-2.5 - Respirable 2.5-Micron Diameter Particulate Matter
- ppm – parts per million
- PPV - Peak particle velocity
- RMS – Root Mean Square Vibration Velocity
- ROG - Reactive Organic Gases
- RWQCB - Regional Water Quality Control Board
- SB – Senate Bill
- SCAB - South Coast Air Basin
- SCAG - Southern California Association of Governments
- SCAQMD – South Coast Air Quality Management District
- SCCIC - South Central Coastal Information Center
- SCS - Sustainable Communities Strategy
- SF6 - Sulfur Hexafluoride
- s.f. – Square Feet
- Sox - Oxides of Sulfur
- SRA - Source Receptor Areas
- STC - Sound Transmission Class
- SWPPP - Storm Water Pollution Prevention Plan
- TAC - Toxic Air Contaminants
- USFWS - United States Fish and Wildlife Service
- USGS - United States Geological Survey
- VMT – Vehicle Miles Traveled
- VOC – Volatile Organic Compound
- VTTM – Vesting Tentative Tract Map
- WQMP - Water Quality Management Plan