

CHAPMAN YORBA VIII PROJECT

NOTICE OF PREPARATION AND INITIAL STUDY



Lead Agency:

City of Orange

Community Development Department • Planning Division

300 East Chapman Avenue

Orange, California 92866-1591

Contact: Robert Garcia, Senior Planner

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Prepared by:

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Date: November 2021

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1.0 INTRODUCTION

Date: November 18, 2021

To: State Clearinghouse, Responsible and Trustee Agencies, Interested Persons, Organizations, and Groups

From: City of Orange Community Development Department

Subject: Notice of Preparation of a Draft Environmental Impact Report

Applicant: Chapman Yorba VIII, LLC, 1601 Dove Street, Suite 175, Newport Beach, CA 92660

Agent: VCS Environmental, 30900 Rancho Viejo Road, Suite 100, San Juan Capistrano, CA 92675

Contact: Robert Garcia, Senior Planner, City of Orange Community Development Department
300 East Chapman Avenue, Orange, CA 92866-1591
Email: rgarcia@cityoforange.org | Phone: (714) 744-7220

Environmental Impact Report: The City of Orange Community Development Department has prepared this Notice of Preparation and Initial Study for the proposed Senior Apartments and Self-Storage Project and has determined that an Environmental Impact Report (EIR) is required. The City of Orange is the Lead Agency for the preparation of the EIR.

Notice of Preparation: This Notice of Preparation and Initial Study has been prepared and distributed to the State Clearinghouse, Responsible and Trustee Agencies, Interested Persons, Organizations, and Groups so that project-related concerns relevant to each agency's statutory responsibilities are addressed in the scope and content of the Draft EIR. In addition, interested persons, organizations, and groups should also provide comments regarding the scope and content of the environmental information to be included in the Draft EIR. Public agencies should identify a contact person in their response. This Notice of Preparation and Initial Study was sent via U.S.P.S. Certified Mail. In addition, this Notice of Preparation and Initial Study was directly uploaded to the CEQAnet Web Portal at the State Clearinghouse of the Governor's Office of Planning and Research.

Project Location: The project site consists of 8.2 acres and located in the southeastern portion of the City of Orange. The site is currently vacant and comprised of two (2) parcels, identified by Assessor's Parcel Numbers (APNs) 093-010-75 and 093-010-74. Regional access to the site would be provided from State Route 55 and local access would be provided from Chapman Avenue and Yorba Street. The project site is situated within an urbanized environment and surrounded by Santiago Creek to the west, the four-story Saint Joseph Medical Group Building, the five-story Chapman Medical Center and Memory Care Facility to the south, Grijalva Park to the north, single-family homes to the east and Chapman Avenue and a dog park to the south.

Project Description Overview: The proposed project involves the development of a 158-unit apartment senior housing project (as defined in Sections 51.3 and 51.12 of the Civil Code) and a 152,653 square foot self-storage building on approximately 8.2 acres of vacant land located in the southeastern portion of the City of Orange. Presently, the General Plan designates the site Open Space (OS) and the existing zoning on the site is Recreation Open Space (R-O). A small portion of the project site, approximately 0.46 acres along the property's southernmost property line adjacent to Chapman Medical Center, is zoned Limited Commercial (C-1).

The proposed project requests approval of a General Plan Amendment, a Zone Change, Conditional Use Permit, Density Bonus Approval of Zoning Waivers of Limited Commercial (C-1) Height Restrictions for Senior Housing, Tentative Parcel Map, Major Site Plan Review, and Design Review to allow for the development of the project.

NOP Comment Period: The City invites you to submit written comments describing your specific environmental concerns, and if representing a public agency, please identify your specific areas of statutory responsibility. Written comments are desired at the earliest possible date. The City will accept your responses for 30 days from the date of this notice. **The NOP public comment period begins on November 18, 2021 and ends on December 20, 2021.** Please send your written comments to Robert Garcia, Senior Planner, at the City of Orange (contact information above), and please include your name, address, and contact information in your correspondence. The City will be accepting email, U.S. mail and phone calls by Governor Gavin Order N-33-20 in response to Covid-19. Administrative staff will be available at the City to accept mail, and calls to the City offices will be forwarded accordingly to the appropriate staff. Phone calls may not be immediately answered, but will be returned.

2.0 PROJECT INFORMATION

In accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*, this Initial Study (IS) has been prepared for the Chapman Yorba VIII Project (proposed project) located at Chapman Avenue and Yorba Street in the City of Orange (City).

Consistent with *State CEQA Guidelines* Section 15064, this Initial Study includes a description of the project and the potential environmental impacts. The City is the Lead Agency under CEQA, and its City Council is responsible for adoption of the environmental analysis and approval of the project.

CONTACT PERSON

Any questions or comments regarding the preparation of this Initial Study, its assumptions, or its conclusions should be referred to:

Robert Garcia, Senior Planner
City of Orange
300 East Chapman Avenue
Orange, California 92866-1591
Phone: (714) 744-7220
rgarcia@cityoforange.org

Project Title:

Chapman Yorba VIII Project

Reference Application Numbers:

General Plan Amendment (GPA) No. 2021-0001
Zone Change Amendment No. (ZC)1304-21
Conditional use Permit (CUP) No. 3147-21
Major Site Plan Review (MJSP) No. 1061-21
Design Review (DRC) No. 5049-21
Environmental Review (ENV) No. 1878-21

Lead Agency:

City of Orange
300 East Chapman Avenue
Orange, California 92866

Contact Person and Telephone No.:

Robert Garcia, Senior Planner
(714) 744-7220

Project Proponent and Address:

Chapman Yorba VIII, LLC
1601 Dove Street, Suite 175
Newport Beach, California 92660

Contact Person and Telephone No.:

Robert Pack
(949) 581-4663

Project Location:

The project site is currently vacant and comprised of two parcels, identified by Assessor's Parcel Numbers (APNs) 093-010-57 and 093-010-74. The project site is in the southeastern portion of the City of Orange, near the intersection of Yorba Street and Chapman Avenue. The project site can be regionally accessed by State Route 55 (SR-55) from the Chapman Avenue exit and locally accessed from Chapman Avenue and Yorba Street.

Existing General Plan Designation:

All of the project site is designated Open Space (OS).

Existing Zoning Classification:

The majority of the project site is zoned Open Space Recreation (R-O). A small portion of the project site, approximately 0.46 acres along the property's southernmost property line adjacent to Chapman Medical Center, is zoned Limited Commercial (C-1).

3.0 PROJECT DESCRIPTION

The proposed project requests approval of a General Plan Amendment, a Zone Change, Conditional Use Permit, Tentative Parcel Map, Density Bonus Waiver of Limited Commercial (C-1) Height Restriction for Senior Housing (as defined in Sections 51.3 and 51.12 of the Civil Code), Major Site Plan Review, and Design Review to allow for the development of a 158-apartment market rate senior housing project (as defined in Sections 51.3 and 51.12 of the Civil Code) and a 152,653 square foot self-storage building on approximately 8.2 acres of vacant land.

PHYSICAL SETTING

The site is currently vacant and comprised of two (2) parcels, identified by Assessor's Parcel Numbers (APNs) 093-010-57 and 093-010-74. The project site is situated within an urbanized environment and is located on the United States Geological Survey (USGS), Orange, California, 7.5 Minute Quadrangle Map (USGS, 2015). The map indicates the elevation of the majority of the property is approximately 260 feet above mean sea level (amsl) and rises to approximately 268 feet amsl within the northeastern portion of the site. Based on topography, surface runoff generated on the property appears to flow from the higher elevations within the northeastern portion, towards the lower elevations bordering Santiago Creek. The vegetation onsite is largely composed of non-native weeds, including thistle, mustard, and castor bean. Additionally, a few non-native California Pepper trees are scattered on the site.

LAND USE SETTING

Historical Land Uses

The site is in a disturbed condition with intermittent piles of discarded rubble and concrete. Subsurface investigations conducted on the site identified deep undocumented fills, consisting of significant amounts of construction debris such as concrete, asphalt concrete, lay pipe, block, and reinforcing steel, metal, wood and organics. As part of the environmental planning for the project, a Phase 1 Environmental Site Assessment was prepared, which involved reviewing regulatory conditions and studies conducted on the property and review of historical use on the project site. Based on review of historical records and historical photographs of the project site dating back from 1938 to the present, there is no indication or record that the project site ever operated as a municipal commercially operated landfill. It appears the site was illegally trespassed and used for unauthorized disposal of construction debris.

Between the early 1940's until the early 1950's, nearby site development included the operation of a gravel quarry located southwest of the project site. The surrounding property appeared mainly agricultural in nature until the early 1960's, when it began to transition primarily into residential development. In the 1960's, single-family residential development bounded the project site to the east. A medical complex appeared to the south of the subject property, on the north side of Chapman Avenue. A municipal landfill was evident within the site vicinity to the northeast. During the mid-1970's into the early 1980's, medical facilities appeared on nearby and surrounding property to the south. By 1985, the surrounding area was heavily urbanized with a mix of commercial, medical, and residential development.

Existing Onsite and Surrounding Land Uses

The project site is located in the southeastern portion of the City of Orange; refer to [Figure 1, *Regional Location*](#). The site can be regionally accessed by State Route 55 (SR-55) from the Chapman Avenue exit. The project site can be locally accessed from Chapman Avenue and Yorba Street; refer to [Figure 2, *Local Vicinity*](#). The property is surrounded by Santiago Creek to the west, the four-story Saint Joseph Medical Group Building, Chapman Medical Center and Memory Care Facility to the south and east, Grijalva Park to the north, single-family homes to the northeast and Chapman Avenue and a dog park to the south.

Planning Programs

The City of Orange General Plan Land Use Policy Map designates the property as Open Space (OS). Additionally, the General Plan identifies that the project site is included within the Tustin Street/Chapman Avenue Focus Area. The focus area includes Chapman Hospital, Yorba Park, and Santiago Creek. The project site is adjacent to and outside the Yorba North Commercial Overlay. The General Plan envisions integration of housing, small-scale commercial uses and pedestrian-orientated features in this area given its relationship to existing neighborhood-serving commercial uses, the Santiago Creek Trail corridor, and Grijalva Park.

The City of Orange City Wide Zoning Map designates the majority of the as project Recreation Open Space (R-O). Along the southernmost property line of the project, adjacent to the Chapman Medical Center, a small portion of the property is comprised of approximately 0.46 acres and is zoned Commercial Limited Business (C-1).

The project site is private property and was not envisioned or planned that all of project site would be for public open space. The intent of the Open Space (OS) designation, supported by City adopted resolution, was that the zoning would act as a holding designation on the property pending a future development proposal considered by the City.

The proposed project includes a request for a General Plan Amendment for that portion of the project site designated as Open Space (OS) and zoned Recreation Open Space (R-O), to General Commercial (GC) and Commercial Limited Business (C-1), to allow for the development of the proposed project.

PROJECT CHARACTERISTICS

The project consists of a 158-unit apartment market rate senior citizen housing development (as defined in Sections 51.3 and 51.12 of the Civil Code) and a 152,653 square foot self-storage facility. Occupancy of the Orange Senior Apartments would be age restricted to 55 years and older in accordance with California Civil Code Sections 51.3 and 51.12. The project's total FAR is 1:1, calculated as follows: Total building area is 357,192 square feet; composed of Senior Apartment Community of 187,785 square feet and the Self-Storage Facility of 152,653 square feet.

Self-Storage Facility

The Self-Storage Facility would be developed on a 1.25 acre site and would consist of a three-story building (plus one basement level) having a maximum height of forty feet (except for the screened roof-top equipment); refer to [Figure 3, Site Plan](#). The Self-Storage Facility would provide a dedicated loading area with direct access to elevators serving its basement level and upper three floors. Each floor would provide 38,241 square feet of storage area. The size of the storage spaces would range from as small as 5 feet by 10 feet to as large as 10 feet by 15 feet. In addition to the loading area, a 900 square foot office and 10 dedicated parking spaces would be provided to serve customers. The Self-Storage Facility would only be accessible to its clientele, and an onsite management office.

Senior Apartments

The Senior Apartments would be situated on 6.95 acres fronting along Santiago Creek. The market rate apartment community would consist of four separate buildings unified by a comprehensive landscape program and outdoor amenities. The residential apartment buildings would consist of three-stories with a maximum height of approximately 43 feet 9 inches. The buildings would occupy approximately 24 percent of the apartment community's site. The project proposes a comprehensive landscape plan for the project that includes the self-storage building and the apartment community buildings. Fifty-one percent of the project site would consist of landscaping. The landscape plan incorporates a combination of trees, shrubs, and ground cover, which would soften views and reduce the visual presence of the buildings by creating a park-like setting around the site.

Occupancy of the senior apartments would be restricted in occupancy as provided in Sections 51.3 and 51.12 of the Civil Code and offered in a variety of 1-bedroom and 2-bedroom configurations to meet the varied needs of differing senior households, including apartments with and without dens, and would range in size from approximately 634 square feet (for a Junior 1 bedroom/1bath unit) to approximately 1,128 square feet (for a 2 bedroom plus den/2 bath unit).

The senior apartments would include onsite amenities for residents. A swimming pool and spa deck area and a 3,126-square foot community room and fitness center on separate floors that would be featured at the center of an L-shaped Building A providing views of Santiago Creek. Open space areas with landscaping would surround the pool deck and a network of paths.



Source: IDEArc Architecture + Planning; July 30, 2021.

CHAPMAN YORBA VIII PROJECT
 Notice of Preparation and Initial Study
Site Plan

Figure 3



CIRCULATION AND PARKING

The primary access for the project would be Yorba Street. The primary access to the storage facility will be off of Yorba Street. Parking for the storage facility includes six on-street parking spaces including two ADA parking spaces. A gate would be provided at the entrance to the senior apartments to control access to the apartment community. A secondary gated emergency access only for emergencies would be provided from McPherson Street. A total of 198 parking spaces including 23 closed garages, 12 ADA/10 electric vehicle (EV) parking spaces would be provided; refer to [Table 1, Onsite Parking](#). The parking area would straddle between the apartment buildings, self-storage building, memory care building and the existing single-family homes. A concrete block wall with a landscaped planter and accent trees would be provided along the parking area providing a visual and sound attenuation buffer. As a public benefit, the project will construct and maintain a multipurpose trail from Yorba Street, along the bank of Santiago Creek, and connecting to McPherson and Grijalva Park. The trail would meet the minimum Trail Standards in the General Plan for trails adjacent to a watercourse channel. The multipurpose public trail width would be a minimum of 10 feet of trail and up to 12 feet to allow for a two-foot buffer in areas where it is possible. The trail would be located along the northern perimeter of the site adjacent to Santiago Creek with trail connections at Grijalva Park to McPherson Street, adjacent to the proposed fire access road to the east, and to the new cul-de-sac at Yorba Street to the west, with a multipurpose trail easement leading to the property boundary with the Orange County Flood Control District (OCFCD). Access from Chapman Avenue to the multipurpose public trail will be via a sidewalk, beginning at Chapman Avenue and continuing to a trail connection at the new cul-de-sac being provided by the project.

Table 1
 Onsite Parking

Parking Types	Quantity
Parking Based on Type of Users	
Number Residents	158 units
Parking Based on Type of Parking Stalls	
American with Disabilities Act (ADA)	12
American with Disabilities Act (ADA) Electric Vehicle (EV)	2
American with Disabilities Act (ADA) Van	2
Compact (C)	0
Electric Vehicle	10
Standard Parking (including 23 Enclosed Garages)	172
Total	198

PROJECT OBJECTIVES

Objectives for the proposed project are defined to aid decision makers in their review of the proposed project and its associated environmental impacts. The project objectives are summarized as follows:

- To provide an economically beneficial use of the portion of the private property that is currently planned Open Space and zoned Recreational Open Space.
- To provide 158-unit apartment market rate senior citizen housing development specially designed to meet the needs of senior citizens.
- To provide convenient self-storage facilities for the local community located on a 1.25-acre portion of the property, a portion of which is currently zoned Limited Commercial (C-1).

REQUIRED PROJECT PERMITS AND APPROVALS

The following are the required project permits and approvals for the project:

- General Plan Amendment of the property to General Commercial (GC)
- Zone Change of the property to Limited Business (C-1)
- Conditional Use Permits for the project's Senior Housing and Self-Storage Facility components
- Tentative Parcel Map
- Density Bonus Waiver of Limited Commercial (C-1) Height Restriction for Senior Housing (as defined in Sections 51.3 and 51.12 of the Civil Code)
- Major Site Plan Review
- Design Review
- Environmental Review
- Grading Permit
- Building Permit Landscape Planting Plan Approval
- Plumbing, Electrical, Structure Permits
- Fire Master Plan

Such other discretionary and/or ministerial approvals as may be identified by the City as necessary to implement development and construction of the project.

4.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below could be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

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

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made 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

Printed Name

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5.0 EVALUATION OF IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

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

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).

All answers must take into account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

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.

“Negative Declaration: Less Than Significant Impact 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).

Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

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 a significant or potentially significant impact to a less than significant level.

THRESHOLDS OF SIGNIFICANCE

Thresholds of significance are identifiable quantitative, qualitative or a performance level for a particular environmental effect. Non-compliance with a threshold means the effect will normally be determined to be significant and, conversely, compliance with a threshold means the effect will normally be less than significant (Guidelines Section 15064.7). The City of Orange relies upon the specific questions relating to environmental impact areas listed in Appendix G of the State CEQA Guidelines to determine a level of significance.

ENVIRONMENTAL BASELINE

To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. Guidelines Section 15125(a) states in pertinent part that the existing environmental setting will normally constitute the baseline physical conditions by which a lead agency will determine if an impact is significant. Therefore, the environmental baseline for the project constitutes the existing physical conditions as they exist at the time that this Notice of Preparation is published.

5.1 AESTHETICS

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

Impact Analysis

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

For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public and is generally designated by public agencies to provide for their preservation. A substantial adverse effect on a scenic vista would occur if the vista were screened from the view, the access to a formerly available public viewing position was blocked, or visual resources were obstructed by view or access to them. The EIR will identify whether the project has the potential to impact to a vista. Mitigation measures will be identified, as necessary.

Significance Determination: Potentially Significant Impact

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

The State Scenic Highway Program was established by the California Department of Transportation (Caltrans) to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to State Highways. Highways may be designated as scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. According to Caltrans, there are no designated or eligible State scenic highways within the viewshed of the proposed project. Therefore, no impacts to scenic resources along a State scenic highway would occur. This issue would not be further evaluated in the EIR.

Significance Determination: No Impact

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

The project site is located within a suburban area. The EIR will identify relevant planning regulations that are applicable that govern the scenic quality of the project area and identify potential conflicts to those regulations, if any. Mitigation measures will be identified, if necessary.

Significance Determination: Potentially Significant Impact

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

Spill light (aka, light trespass) occurs when lighting fixtures such as streetlights, parking lot lighting, exterior building lighting, and landscape lighting are not properly aimed or shielded to direct light to the desired location and light escapes and partially illuminates a surrounding location. Glare is the result of improperly aimed or blocked lighting sources that are visible against a dark background such as the night sky. Glare may also refer to the sensation experienced looking into an excessively bright light source that causes a reduction in the ability to see or causes discomfort. Glare generally does not result in illumination of offsite locations but results in a visible source of light viewable from a distance. The project area is currently developed with urbanized land uses that provide various levels of nighttime lighting. The EIR will evaluate the contribution of additional light and glare that could potentially occur from the project fixtures and components as they will be placed. Mitigation measures will be identified, as necessary.

Significance Determination: Potentially Significant Impact

5.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. <i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

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?

The State of California Farmland Mapping and Monitoring Program indicates that there is no Prime Farmland, Unique Farmland or Farmland of Statewide Importance on the project site. Additionally, the City of Orange General Plan does not identify any agricultural lands on the project site or surrounding area. Therefore, no impacts to Prime Farmland, Unique Farmland or Farmland of Statewide Importance would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

The project site is zoned for Recreation Open Space and Commercial land uses. Therefore, the development of the site would not conflict with any lands zoned for agriculture uses. According to the property title report, the project site is not under a Williamson Contract. Implementation of the proposed project would have no impact regarding potential conflicts with existing agriculture zoning or Williamson Act contracts on the property. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

The proposed project would not cause a rezone of lands that are zoned for forest land or timberland. Therefore, no impacts to forest land, timberland or lands zoned for timberland would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

There are no existing forest lands or timberland resources on the property and the project site is not zoned for timberland production. Implementation of the proposed project would not result in the loss of forest land. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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?

The project site and surrounding properties do not contain farmland or timberland resources. The construction and operation of the proposed project would be confined to the project site and would not cause any onsite or offsite conversion of farmland or forest land to non-agriculture uses or non-forest uses. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

5.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions such as those leading to odors adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

The project site is in the South Coast Air Basin (Basin) and is subject to the Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD). An AQMP provides the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the state implementation plan and is based on growth projections from local general plans. Implementation of the proposed project would involve the site clearing and grading to allow for construction of the proposed project. The EIR will evaluate consistency of the proposed project with regional growth forecasts and any impacts its development may have on the attainment of regional air quality objectives provided in the AQMP. Mitigation measures will be identified, as needed.

Significance Determination: Potentially Significant Impact

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?

The project site is in the South Coast Air Basin and is designated under the California and National Ambient Air Quality Standards (AAQS) as nonattainment for ozone (O₃), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), nitrogen oxides (NO_x) (California standard only), and lead. Implementation of the proposed project could potentially increase existing levels of criteria pollutants and contribute to their nonattainment status in the Basin. Construction activities related to the proposed project would generate exhaust from construction equipment and vehicle trips, fugitive dust from demolition and ground-disturbing activities, and off-gas emissions from architectural coatings and paving. Additionally, the proposed project would generate long-term emissions from transportation sources (e.g., passenger and truck trips), area sources (e.g., onsite equipment, landscaping, cleaning products, and paints used for architectural coating), energy usage

(e.g., natural gas used for heating). The EIR will evaluate whether the proposed project's short- and long-term emissions would exceed SCAQMD's regional significance thresholds and would result in a cumulatively considerable net increase in any criteria air pollutant. Mitigation measures will be recommended, as needed.

Significance Determination: Potentially Significant Impact

c) Expose sensitive receptors to substantial pollutant concentrations?

An impact is potentially significant if emission levels exceed the state or federal ambient air quality standards, thereby exposing sensitive receptors to substantial pollutant concentrations. Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). There are sensitive receptors within the vicinity of the project site that could potentially be exposed to substantial pollutant concentrations of criteria air pollutants and toxic air contaminants associated with construction and operational activities for the project. The EIR will evaluate the potential for construction and operation activities of the proposed project to exceed SCAQMD's localized significance thresholds in accordance with SCAQMD's guidance methodology. In addition, the EIR will also evaluate the potential health risk impacts to offsite sensitive receptors from project-related construction and operation activities from exposure to toxic air contaminants (e.g., diesel particulate matter) generated from use of off-road construction equipment during construction activities and from diesel-powered transport trucks. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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

The threshold for significant odor impact is when a project creates an odor nuisance as defined SCAQMD Rule 402, Nuisance, which states: That a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The EIR will evaluate potential odor impacts associated with the construction and operation of the project and potential conflicts with SCAQMD Rule 402. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

5.4 BIOLOGICAL RESOURCES

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

Impact Analysis

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

The project site has been disturbed from its natural state from prior activities. Therefore, there is little potential for the property to contain candidate, sensitive, or special status species. However, adjacent to the project site is suitable habitat within Santiago Creek. As part of the EIR, a qualified biologist will conduct a reconnaissance-level survey of the entire project site to document the site's existing biological resources and to determine the presence or absence of sensitive species and will evaluate if

potential impacts to habitat in Santiago Creek associated with the construction and operation of the project would occur. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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

VCS Environmental to determine the presence of riparian habitat or other sensitive natural communities that are recognized as sensitive vegetation community by the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service. The EIR will evaluate potential impacts to riparian habitat and other sensitive natural communities associated with the construction and operation of the project. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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

VCS Environmental to determine the presence of state or federally protected wetlands. The EIR will evaluate potential impacts to potential wetland habitat associated with the construction and operation of the project. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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?

Regional wildlife movement corridors facilitate the regional movement of wildlife and are generally located near water ways, ridgelines, riparian corridors that are contiguous to open space areas that provide supporting habitat. The project is adjacent to Santiago Creek which functions as a wildlife movement corridor. Additionally, there are nearby trees that could potentially provide supporting habitat for several migratory bird species, which could be protected by the federal Migratory Bird Treaty Act of 1918. The EIR will evaluate potential impacts to wildlife movement along Santiago Creek and potential impacts migratory birds associated with the construction and operation of the project. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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

The City of Orange currently has an ordinance providing for the protection or replacement of trees. The EIR will evaluate potential conflicts with the City's Tree Preservation Ordinance associated with the construction and operation of the project. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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

The project site is not located within a Natural Community Conservation Plan (NCCP) or Habitat Conservation Plan (HCP).

Significance Determination: No Impact

5.5 CULTURAL RESOURCES

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

Impact Analysis

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

Section 15064.5 of the CEQA Guidelines defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or by the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- Is associated with the lives of persons important in our past.
- 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.
- Has yielded, or may be likely to yield, information important in prehistory or history.

Preliminary information indicates there are no known historical resources on the project site. However, known historical resources are known to occur in the area. The EIR will evaluate the potential for known and unknown historical resources to be present on the project site. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

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

The regional project area is known to contain archaeological resources. The ground-disturbing grading activities associated with the proposed project could have the potential to uncover previously undiscovered archeological resources. As part of the preparation of the EIR, a Cultural Resources Assessment will be prepared, with a literature review, records search, and site survey to determine

the potential for site-specific archaeological resources to occur on the site and if potential impacts could occur from construction activities associated with the proposed project. If required, mitigation measures will be recommended.

Significance Determination: Potentially Significant Impact

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

There are no known burial grounds on the project site. However, the regional area is known to contain previously discovered cultural resources. Therefore, there could be the potential that unknown burial remains could be encountered from the project excavation operations. The EIR will evaluate the potential for unknown burial remains to be present on the project site. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

5.6 ENERGY

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

The proposed project would involve site clearing and grading to allow for the construction of the proposed project. The construction activities would result in the consumption of energy. Additionally, the operation of the proposed project would require additional amounts of energy compared to existing conditions. The EIR will evaluate the potential for the project to generate a substantial increase in energy use. Mitigation measures will be incorporated as needed.

Significance Determination: Potentially Significant Impact

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

The regulatory setting related to energy conservation is primarily addressed through State and County regulations. The State regulations include California Code of Regulations (CCR), Title 20, Division 2, Chapter 4, Article 4, Sections 1601-1609 control the energy-efficiency of appliances, California Code of Regulations (CCR), Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings and CCR Title 24, Part 11: California Green Building Standards. Additionally, the City of Orange General Plan, Natural Resources Element, identifies energy reduction goals and policies. The EIR will identify the energy consumption requirements for the proposed project and will evaluate the project consistency with State and County energy reduction programs, regulations, and policies. Mitigation measures will be incorporated as needed.

Significance Determination: Potentially Significant Impact

5.7 GEOLOGY AND SOILS

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

Impact Analysis

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- 1) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

The Alquist-Priolo Earthquake Fault Zoning Act (Act) regulates development near active faults to mitigate the hazards of surface fault-rupture. An active fault is one that has experienced earthquake activity in the past 11,000 years. Under the Act, the State Geologist is required to delineate special study zones along known active faults, known as Alquist-Priolo Earthquake Fault Zones. The Act also requires that prior to approval of a project, a geologic study be prepared to define and delineate any hazards from surface rupture and that a building setback be established from any known trace hazard. According to the California Geologic Survey, there is no Alquist-Priolo Earthquake Fault Zones on the project site or in the nearby area. Therefore, the proposed project would not directly or indirectly be exposed to ground rupture impacts. Therefore, no ground rupture impacts would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

2) Strong seismic ground shaking?

Like other areas in Southern California, the project site is within a seismic active area that could be subject to seismic ground shaking impact, possibly of strong intensity. The proposed project is considered to have the potential for risk of injury to persons or properties from strong seismic ground shaking impacts. As part of preparation of the EIR, a Preliminary Geotechnical Investigation Report will be prepared that will address potential seismic ground shaking impacts and the potential for risks to persons or properties. Mitigation will be proposed for any impacts determined to be potentially significant.

Significance Determination: Potentially Significant Impact

3) Seismic-related ground failure, including liquefaction?

Liquefaction is the phenomenon in which loosely deposited soils located below the water table undergo rapid loss of shear strength due to excess pore pressure generation when subject to strong earthquake induced ground shaking. Liquefaction is known generally to occur in saturated or near-saturated cohesion-less soils at depths shallower than 50-feet below the ground surface. According to the California Department of Conservation Hazard Zone Map for Orange United States Geological Survey (USGS) Quadrangle, the project site is located within a Seismic Hazard Zone for Liquefaction Potential. As part of the preparation of the EIR, a Preliminary Geotechnical Investigation Report will be prepared that will address potential liquefaction impacts and the potential for risks to persons or properties. Mitigation will be proposed for any impacts determined to be potentially significant.

Significance Determination: Potentially Significant Impact

4) Landslides?

According to the California Geologic Survey Landslide Hazard Map for the Orange Quadrangle, the project site is not located within a zone susceptible to earthquake-induced landslides. Additionally, the proposed project would not create slopes or features that would increase the landslide potential beyond existing conditions. No impacts regarding potential landslide impacts would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

The construction of the proposed project would require grading of the majority of the project site. The land clearing and grading activities associated with the construction activities would uncover soil, which could be subject to erosion impacts caused by water and wind. Additionally, construction equipment and vehicles could indirectly transport sediment to offsite locations. The EIR will evaluate potential erosion impacts associated with the construction activities for the proposed project and, where needed, will identify mitigation measures to reduce potential erosion impacts.

Significance Determination: Potentially Significant Impact

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

As part of the preparation of the EIR, a Preliminary Geotechnical Investigation Report will be prepared that will identify the potential for ground failure constraints that could affect the geotechnical stability of the project and, where needed, will identify mitigation measures to ensure the geotechnical stability of the project.

Significance Determination: Potentially Significant Impact

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

Expansive soils are defined as fine grained silts and clays which are subject to swelling and contracting. The amount of swelling and contracting would be subject to the amount of fine-grained clay materials present in the soils and the amount of moisture either introduced or extracted from the soils. As part of the preparation of the EIR, a Preliminary Geotechnical Investigation Report will be prepared that will identify the potential for onsite expansive soils that could affect the geotechnical stability of the project and, where needed, will identify mitigation measures to ensure the geotechnical stability of the project.

Significance Determination: Potentially Significant Impact

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur regarding septic tanks or alternative wastewater disposal systems. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

Although no fossil-bearing geologic formations are known to exist on the project site, they are known to occur in the regional area. It is possible that during grading and construction activities, fossil remains, or other paleontological resources could be found. As part of the preparation of the EIR, a records search will be conducted to determine the potential for paleontological resources to occur.

The records search results and background context will be summarized in the EIR to determine the potential to encounter paleontological resources. Mitigation measures, if required, will be recommended.

Significance Determination: Potentially Significant Impact

5.8 GREENHOUSE GAS EMISSIONS

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

Impact Analysis

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

The proposed project would involve ground clearing and grading to prepare the site for construction of the proposed project. The construction activities would generate GHG emissions. Additionally, the operation of the proposed project would also generate GHG emissions. The EIR will evaluate the construction and operational GHG emissions associated with implementation of the proposed project. Mitigation measures will be identified, as necessary.

Significance Determination: Potentially Significant Impact

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

The California Air Resources Board’s (CARB) Scoping Plan is California’s GHG reduction strategy to achieve the state’s GHG emissions reduction target, established by AB 32, of meeting 1990 emission levels by year 2020. In addition, SB 375, the Sustainable Communities and Climate Protection Act of 2008, was adopted by the legislature to reduce per capita vehicle miles traveled and associated GHG emissions from passenger vehicles. The Southern California Association of Government’s (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; SCAG 2016) identifies the per capita GHG reduction goals for the SCAG region.

The City of Orange General Plan, Natural Resources Element, includes goals and policies to reduce GHG emissions. Implementation of the proposed project could generate a net increase of GHG emissions within the region. As a result, the proposed project has the potential to conflict with the GHG reduction targets of CARB’s Scoping Plan. The EIR will evaluate consistency of the proposed project with the CARB Scoping Plan, SCAG’s 2016-2040 RTP/SCS and the City of Orange General Plan, Natural Resources Element. Mitigation measures will be identified, as necessary.

Significance Determination: Potentially Significant Impact

5.9 HAZARDS AND HAZARDOUS MATERIALS

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

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

Title 22 of the California Code of Regulations (CCR), Division 4.5, Chapter 11, Article 3, classifies hazardous materials into the following four categories based on their properties:

- Toxic (causes human health effects),
- Ignitable (has the ability to burn),
- Corrosive (causes severe burns or damage to materials), and
- Reactive (causes explosions or generates toxic gases).

As part of the preparation of the EIR, a Phase 1 Environmental Site Assessment will be prepared to identify if there are any onsite hazardous substances that could pose hazards to the public, or the environment associated with the construction and operation of the proposed project. If needed, mitigation measures will be identified to reduce hazardous material exposure risks to the public and the environment.

Significance Determination: Potentially Significant Impact

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?

The construction operations associated with the proposed project would involve the handling of incidental amounts of hazardous substances, such as solvents, fuels, and oil. The inadvertent release of these substances would potentially result in adverse impacts to the environment. The EIR will evaluate the potential for the project to release hazardous materials into the environment. If needed, mitigation measures will be identified to reduce risk of the release of hazardous substances into the environment.

Significance Determination: Potentially Significant Impact

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

The Orange Unified School District Community Day School, located at 250 South Yorba Street, is within approximately 0.25 miles from the project site. The EIR will evaluate the potential for the Community Day School to be affected by hazardous emissions or the handling of hazardous or acutely hazardous materials, or substances associated with the construction and operation of the project. Mitigation measures will be recommended, as necessary.

Significance Determination: Potentially Significant Impact

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?

As part of the preparation of the EIR, a Phase 1 Environmental Site Assessment will be prepared to identify any known or suspected environmental concerns or recognized environmental conditions that could be associated with the project site, adjoining properties, and nearby locations that could be suspected sites containing environmental contamination pursuant to Government Code Section 65962.5. This issue will be evaluated in the EIR, and mitigation measures will be recommended, as necessary.

Significance Determination: Potentially Significant Impact

- 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?**

The project site is not located within an airport land use plan and there are no public airports within two miles of the project site. The nearest airport would be John Wayne Airport, located approximately 8 miles from the project site. Therefore, the project site would not be subject to aircraft safety hazards or excessive aircraft noise impacts. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

Emergency evacuations for the City of Orange would be the responsibility of the City of Orange Police Department and Fire Department. The EIR will evaluate if the proposed project would have the potential to physically interfere with applicable Emergency Response Plans. Mitigation measures will be recommended, as necessary.

Significance Determination: Potentially Significant Impact

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

According to the City of Orange General Plan Environmental and Natural Hazard Policy Map, the project site is not in an area that has been designated as a Wildland Fire Hazard Area.

Significance Determination: No Impact

5.10 HYDROLOGY AND WATER QUALITY

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

Impact Analysis

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

The project site is adjacent to Santiago Creek. Downstream, the Santiago Creek flows into the Santa Ana River which ultimately drains into the Pacific Ocean at the river mouth. The proposed project involves the ground clearing and grading activities that would have potential to generate degraded surface water runoff that could violate water quality or waste discharge standards. Additionally, the proposed project would also result in the construction of new impervious surfaces such as parking lots, sidewalks, and buildings that would increase the levels of runoff from the project site. There would be the potential that the construction and operation of the project could result in the violation of any water quality or waste discharge standards or substantially degrade surface water quality. Potential

impacts to water quality will be evaluated in the EIR, and mitigation measures will be identified, as necessary.

Significance Determination: Potentially Significant Impact

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

The proposed project would have no activities that would extract groundwater or interfere with groundwater recharge activities. No impacts to existing groundwater supplies would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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

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

The construction of the proposed project would require ground clearing and grading of the project site. The land clearing and grading activities associated with the proposed project would uncover soil, which could be subject to erosion impacts caused by water and wind. Additionally, construction equipment and vehicles could indirectly transport sediment to offsite locations. The EIR will evaluate potential erosion impacts associated with the construction activities for the project and, where needed, will identify mitigation measures to reduce potential erosion impacts.

Significance Determination: Potentially Significant Impact

2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The proposed project could potentially change the existing drainage pattern of the site. As part of preparation of the EIR, hydrology and drainage studies will be prepared to analyze pre- and post-development changes to the rate and amount of onsite surface runoff. Mitigation measures will be provided, as necessary.

Significance Determination: Potentially Significant Impact

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

The proposed project could potentially create runoff water which could exceed the capacity of existing or planned stormwater drainage systems and introduce additional sources of polluted runoff to downstream receiving water bodies. Project impacts on existing and planned storm drainage systems will be analyzed in the project drainage and hydrology studies and will be addressed in the EIR. Best Management Practices (BMPs) to be incorporated in the project will also be discussed in the EIR. Mitigation measures will be provided, as necessary.

Significance Determination: Potentially Significant Impact

4) Impede or redirect flood flows?

As shown on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Map No. 06059C0162J, effective December 3, 2009, shows Santiago Creek as a 100-Year Flood Hazard. The EIR will evaluate if the project would have the potential to impede or redirect flood flows within Santiago Creek. Mitigation measures will be provided, as necessary.

Significance Determination: Potentially Significant Impact

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

The project site is not located near the coastline; therefore, the project would not be at risk for a tsunami to potentially release pollutants. The project site is located adjacent to Santiago Creek, downstream of the Santiago Recharge Basins, Irvine Lake and Villa Park Dam. The EIR will evaluate the potential for inundation and risk of release of pollutants from upstream water bodies. Mitigation measures will be provided, as necessary.

Significance Determination: Potentially Significant Impact

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

The California Sustainable Groundwater Management Act (SGMA) was passed in 2014. The law provides increased authority for local agencies to manage groundwater and requires that most groundwater basins be under sustainable management within 20 years in a manner that would be maintained without causing undesirable results. The proposed project would have no activities that would extract groundwater or interfere with groundwater recharge activities. No impacts to existing groundwater supplies would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

5.11 LAND USE AND PLANNING

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) Physically divide an established community?

The project site is currently undeveloped and situated within a suburban setting. The eastern boundary of the project site is adjacent to single family homes that are separated by a block wall. The proposed project would involve the construction of a self-storage facility and senior apartment community. The EIR will evaluate if the proposed project would introduce any physical divisions within the existing community. Mitigation measures will be provided, as necessary.

Significance Determination: Potentially Significant Impact

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?

The City of Orange General Plan Land Use Policy Map designates the property as Open Space (OS). Additionally, the General Plan identifies that the project site is included within the Tustin Street/Chapman Avenue Focus Area. The focus area includes Chapman Hospital, Yorba Park, and Santiago Creek. The project site is adjacent to and outside the Yorba North Commercial Overlay. The General Plan envisions integration of housing, small-scale commercial uses and pedestrian-orientated features in this area given its relationship to existing neighborhood-serving commercial uses, the Santiago Creek Trail corridor, and Grijalva Park.

The City of Orange Citywide Zoning Map designates the majority of the project site as Recreation Open Space (R-O). Along the southernmost property line of the project, adjacent to Chapman Medical Center, a small portion of the property is comprised of approximately 0.46 acres and is zoned Commercial Limited Business (C-1).

The proposed project includes a request for a General Plan Amendment for that portion of the project site designated as Open Space (OS) and zoned Recreation Open Space (R-O), to Commercial Limited Business (C-1), to allow for the development of the proposed project.

The EIR will evaluate whether the project would cause any 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. Mitigation measures will be provided, as necessary.

Significance Determination: Potentially Significant Impact

5.12 MINERAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

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?

The City of Orange General Plan identifies that mineral resource deposits in the City of Orange are primarily limited to the sand and gravel resources contained in and along the Santa Ana River and Santiago Creek. Sand and gravel resources are referred to collectively as “aggregate.” Aggregate is the primary component of Portland cement concrete, a material widely used in the construction industry. The state requires general plan land use policy to recognize the importance of these deposits to the region’s economy. Historical records and photographs of the project area show a sand and gravel quarry was located southwest of the project site. There is no record that sand and gravel operations occurred on the site. Additionally, geotechnical investigations and boring samples conducted on the property show there are no underlying mineral deposits. The proposed project does not involve any activities that involve extraction of sand and gravel resources. Additionally, the proposed General Plan Amendment and Zone Change would not permit mineral resource extraction. Therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state, and no impacts would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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?

Implementation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

5.13 NOISE

<i>Would the project result in:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

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?

The proposed project involves the construction of a self-storage facility and a senior apartment community. Construction activities associated with the proposed project would result in a temporary increase in noise levels at the project site and at adjacent land uses. Additionally, the operation of the proposed project would result in additional sources of noise compared to existing conditions. As part of the preparation of the EIR, a Noise Impact Report will be prepared to evaluate short-term construction related noise impacts and long-term operational noise impacts and the potential for the project to conflict with applicable noise standards. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

Potential groundborne vibration impacts would be associated with construction activities at the project site, including ground clearing, grading, and building construction. These temporary increased levels of vibration could potentially impact vibration-sensitive land uses (residential uses) within the project area. The EIR will evaluate short-term construction related vibration impacts and long-term operational vibrational impacts and the potential for the project to conflict with applicable vibration standards. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

The nearest airport would be John Wayne Airport, located approximately eight miles from the from the project site. According to the John Wayne Airport Land Use Compatibility Plan, the project site is not located within an airport influence area. Additionally, there are no public airports or private airstrips within two miles of the project site. The project site would not be exposed to excessive overhead aircraft noise impacts. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

5.14 POPULATION AND HOUSING

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

Impact Analysis

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

The City of Orange General Plan currently designates the project site General Commercial (GC) and Open Space (OS). The project proposes a market rate senior housing community and will require a General Plan Amendment to General Commercial (GC) on a portion of the project site. Implementation of the project would increase housing and population levels in the City of Orange. The EIR will evaluate if the increased population and housing will conflict with local and regional growth forecasts and if the project would induce substantial unplanned population growth. Mitigation measures will be identified as necessary.

Significance Determination: Potentially Significant Impact

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

The proposed project would not displace any existing housing that would require replacement housing because no housing exists on the project site. The construction of the proposed project would generate short-term employment opportunities. It is anticipated that the employees for the proposed project would be from the local area and would not generate a need for new housing construction and no impacts would occur. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

5.15 PUBLIC SERVICES

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

Impact Analysis

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

1) Fire protection?

Construction and operation of the proposed project would increase the demand for fire protection services compared to the current level of demand. The EIR will evaluate whether the project would cause substantial adverse physical impacts associated with the provision of new or physically altered fire department 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. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

2) Police protection?

Construction and operation of the proposed project would increase the demand for police protection services compared to the current level of demand. The EIR will evaluate whether the project would cause substantial adverse physical impacts associated with the provision of new or physically altered police 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. As part of the EIR, the City of Orange Police Department

would be consulted with to determine the adequacy of existing resources and potential project impacts on police services and response times. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

3) Schools?

The proposed project would involve the development of a self-storage facility and senior apartment community with occupancy restricted as provided by Sections 51.3 and 51.12 of the Civil Code. While the project is not expected to result in an increase in the school-aged child population, the project will pay applicable school fees. Pursuant to Section 65995(h) of the Government code, payment of these fees provides full and complete mitigation of school facilities impacts under CEQA. This issue will be further discussed in the EIR.

Significance Determination: No Impact

4) Parks?

The EIR will evaluate if existing parkland within the City of Orange would be adequate to meet the needs of the of the proposed project and if there would be a need to construct new park facilities or modify existing park facilities, which could cause potential impacts to the environment. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

5) Other public facilities?

The EIR will evaluate if existing public facilities such as hospitals, community-based clinics, or other health service facilities or programs would be adequate to meet the needs of the proposed project and if there would be a need to construct new public facilities which could cause potential impacts to the environment. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

5.16 RECREATION

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

The project site is included within the Mile 3 Segment of the Santiago Creek Vision Plan (SCVP) which is a community-based vision plan for the Santiago Creek corridor. The SCVP was prepared by public and private parties to examine the potential for:

- 1) Developing a continuous multipurpose trail on the upper bank of the creek (uplands area) from Santiago Oaks Regional Park to the Santa Ana River Trail;
- 2) Creating a greenway along the creek by restoring the creek bed and its adjacent uplands with native trees and shrubs;
- 3) Maximizing ground water recharge by restoring the creek bed in specific areas; and
- 4) Maintaining or improve existing level of flood protection.

Within the Mile 3 Segment, the SCVP identifies recreation trail amenities that would connect to Grijalva Park, located north of the project site. The EIR will review the applicability of SCVP goals and objectives to the project and will evaluate if the proposed project would increase the demand for existing recreation facilities in the area or would accelerate substantial deterioration of existing recreation facilities. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

The proposed project proposes recreation facilities for future residents. In addition, the project proposes to improve and maintain a multipurpose trail from Yorba Street, along the bank of Santiago Creek, and connecting to Grijalva Park. The EIR will evaluate potential impacts associated with the construction of the proposed recreation facilities as part of the overall impacts associated with the project. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

5.17 TRANSPORTATION

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

Impact Analysis

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

The project would increase auto and pedestrian trips to and from the project site compared to the existing condition. As part of preparation of the EIR, a Traffic Impact Report would be prepared that would evaluate level of service impacts on project area roadway segments and intersections. Additionally, the Traffic Impact Report will evaluate project traffic impacts and cumulative traffic impacts from other development projects in the area and will assess the potential for the project to conflict with programs, plans, ordinances, or policies addressing the project area circulation system. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

The project would result in additional vehicle miles traveled (VMT) compared to the existing condition. The EIR will evaluate project VMT impacts in accordance with the City of Orange Guidelines for Evaluating VMT under CEQA. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

The proposed project would reconfigure Yorba Street and would create a new secondary access off McPherson Street. The EIR will evaluate if the proposed roadway improvements would increase traffic hazards. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

d) Result in inadequate emergency access?

The EIR will evaluate if the construction and operation of the proposed project will adversely impact emergency access to and from the project site. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

5.18 TRIBAL CULTURAL RESOURCES

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

Impact Analysis

- 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:**

Santiago Creek, a major watercourse in Orange County, is the watershed for the northern Santa Ana Mountains and is a tributary of the Santa Ana River. Native Americans inhabited these watersheds for up to 12,000 years. It provided a water and food source, travel route, and a place to conduct trading activities for the Gabrielino Indians, whose territory included the Santiago Creek watershed and who lived on its banks. In the later 18th and early 19th centuries, it would have also provided a link between the El Camino Real and the Santa Ana River. The Juaneño or Acjachemen are also thought to have been drawn to the Creek's resources, especially in its upper reaches.

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)?

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to California Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation for tribal cultural resources. Consultation with Native American Tribes would be initiated during the NOP public review period. Mitigation will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

Preliminary information indicates there are no known historical resources on the project site. However, known historical resources are known to occur in the area. The EIR will evaluate the potential for known and unknown historical resources to be present on the project site. Mitigation measures will be recommended as needed.

Significance Determination: Potentially Significant Impact

5.19 UTILITIES AND SERVICE SYSTEMS

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

Impact Analysis

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

Implementation of the proposed project would increase the demands for utilities and service systems compared to the existing condition. The project would require the construction of new utilities and provide connections to existing utilities. The EIR will evaluate potential impacts associated with increased demands for utilities and service system. Additionally, the EIR will evaluate potential impacts that could occur from the construction of new utilities and/or expansion of existing utility facilities. Mitigation measures will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

Water service for the proposed project would be provided by the City of Orange. Implementation of the proposed project would increase the demand for water service within the project area compared to the existing condition. The EIR will evaluate the availability of adequate water supplies to serve the project from existing entitlements and reasonably foreseeable future development during normal, dry, and multiple dry years. Mitigation measures will be identified, as needed.

Significance Determination: Potentially Significant Impact

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?

Wastewater service for the proposed project would be provided by City of Orange. Implementation of the proposed project would increase the demand for wastewater service within the project area compared to the existing condition. The EIR will evaluate potential impacts associated with increased demands for wastewater service and if adequate capacity would be available to the project. Mitigation measures will be identified, as needed.

Significance Determination: Potentially Significant Impact

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?

The proposed project would increase the amount of solid waste generated within the project area compared to the existing condition, thereby resulting in a contribution of waste that would add to the capacity at existing landfills and transfer stations that are designated to serve the project. The EIR will evaluate potential impacts associated with increased demands for solid waste disposal and if adequate capacity would be available to the project. Mitigation measures will be identified, as needed.

Significance Determination: Potentially Significant Impact

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

The proposed project would produce solid waste associated with the demolishing and construction stages as well as during operation. The proposed project would be required to comply with state and local statutes and regulations related to solid waste. The EIR will identify state and local solid waste regulations that the project would be required to comply with. Mitigation measures will be identified, as needed.

Significance Determination: Potentially Significant Impact

5.20 WILDFIRE

<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

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

According to the California Department of Forestry and Fire Protection, the project site is not identified as a High Fire Hazard Area or near a State Responsibility Area. The City of Orange Police Department would be responsible for evacuating neighborhoods in the event of a fire that threatens homes. These evacuations would be decided within the Incident Command structure in consultation with the fire department, law enforcement, public works, and local government liaisons to establish when and where they would occur. In the event of an emergency, residents would be directed to specific evacuation routes to avoid conflicts with emergency response plans. Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan in or near state responsibility areas or lands classified as very high fire hazard severity zones. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

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?

According to the California Department of Forestry and Fire Protection, the project site is not identified as a High Fire Hazard Area or near a State Responsibility Area. Additionally, the project site is not contiguous to wildland slope areas that could act as a conduit for wildland fire. Additionally, the proposed project would have surrounding roadways and driveways which would also act as fire breaks. Therefore, the proposed project would not exacerbate wildfire risks, and thereby expose project

occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire in or near state responsibility areas or lands classified as very high fire hazard severity zones. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

- 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?**

According to the California Department of Forestry and Fire Protection, the project site is not identified as a High Fire Hazard Area or near a State Responsibility Area. The proposed project would not require the construction of any infrastructure that would increase fire risk. The project includes the construction of water infrastructure and other utility improvements that would aid in fire suppression. The proposed project does not include any changes to existing roadways that would exacerbate fire risk. The proposed project would not require the installation or maintenance of associated infrastructure that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. Potential impacts would be less than significant. Therefore, the proposed project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment in or near state responsibility areas or lands classified as very high fire hazard severity zones. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

- 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?**

According to the California Department of Forestry and Fire Protection, the project site is not identified as a High Fire Hazard Area or near a State Responsibility Area. The proposed project would not increase the risk for wildland fire impacts that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-fire slope instability, or drainage changes in or near state responsibility areas or lands classified as very high fire hazard severity zones. This issue will not be further evaluated in the EIR.

Significance Determination: No Impact

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

Construction of the proposed project would have the potential to impact biological resources. The EIR will include the preparation of a Biological Resources Study to evaluate and determine if potential impacts to biological resources would occur. Additionally, the project would involve ground disturbing activities that could damage previously undiscovered archaeological and/or paleontological resources that could be located at the project site. The EIR will include the preparation of a Cultural Resources Report that will evaluate and determine if potential impacts to cultural resources would occur. Mitigation measures will be recommended, as needed.

Significance Determination: Potentially Significant Impact

- b) 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)?**

Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. There would be the potential that the proposed project in conjunction with other projects would contribute to potentially significant cumulative impacts. Therefore, potential for cumulative impacts will be analyzed in the EIR. Mitigation measures will be recommended, as needed.

Significance Determination: Potentially Significant Impact

- c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

The proposed project could result in air quality, geotechnical, greenhouse gas, hazardous material, hydrology, noise, and wildfire impacts that could result in adverse effects on human beings. These impacts will be addressed in the EIR, and mitigation measures will be recommended, as needed.

Significance Determination: Potentially Significant Impact

6.0 REFERENCES

The following references were utilized during preparation of this Initial Study/Environmental Checklist. These documents are available for review at the City of Orange located at 300 E. Chapman Avenue, Orange, CA 92866.

California Department of Conservation, *State of California Seismic Hazard Zones*, Orange Quadrangle, Official Map of Liquefaction Zone, accessed December 2019.

California Department of Forestry and Fire Protection, City of Orange *Fire Hazard Severity Zones in SRA*, accessed July 2021.

California Department of Forestry and Fire Protection. *Very High Fire Hazard Severity Zones in City of Orange Map*, accessed in November 2021.

California Department of Transportation, *California Scenic Highway Mapping System*, accessed July 2021.

City of Orange General Plan, March 2010.

State of California Department of Conservation, *Farmland Mapping and Monitoring Program*, accessed July 2021.

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