BATAVIA SELF-STORAGE PROJECT

MITIGATED NEGATIVE DECLARATION NO. 1884-22

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November 2023

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TABLE OF CONTENTS

I Preliminary Priority Water Quality Management Plan
J Noise Impact Analysis
K Trip Generation Screening Memo
L VMT Screening Memo

Figures

Tables

Appendices

MITIGATED NEGATIVE DECLARATION NO. 1884-22

Project Title:
Batavia Self-Storage Project

Reference Application Numbers:
Major Site Plan Review No. 1089-22
Design Review No. 1089-22
Environmental Review No. 1884-22

Lead Agency:
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Contact Person and Telephone No.:
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(858) 531-2099

Project Location:
The Project site is located at 630 Batavia Street in the City of Orange, Orange County, California (Figure 1, *Regional Location*). The Project site is adjacent to Batavia Street to the east and the Atchison, Topeka, and Santa Fe Railway to the north.

Existing General Plan Designation:
Light Industrial (Max FAR 1.0)

Existing Zoning Classification:
Industrial Manufacturing (M-2)

INTRODUCTION

The applicant for the Batavia Self-Storage Project (Project) is requesting approval from the City of Orange to demolish the existing structures on the Project site and to construct three self-storage buildings totaling 133,372 square feet (SF). The Project would include a parking lot, ornamental landscaping, and associated infrastructure.

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

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

EXISTING SETTING

Regional Setting

The Project site is located at 630 Batavia Street, Orange, California, 92868. The site is within the United States Geological Survey (USGS) Orange 7.5-Minute Series Quadrangle and can be identified within

Township 4 South, Range 9 West, San Bernardino Base and Meridian. The Project site is approximately 28 miles southwest of Los Angeles and 7.9 miles northwest of Irvine.

Regional access to the Project site is provided by State Route 57 (SR-57) located approximately 0.8-mile west of the site, State Route 55 (SR-55) located 1.78 miles east of the site, State Route 22 (SR-22) located 1.3 miles south of the site, and Interstate 5 (I-5) located 1.40 miles southwest of the site. Additionally, State Route 91 (SR-91) is located 3.35 miles north of the site. The Project site is located northwest of the intersection of Walnut Avenue and Batavia Street and a railroad runs along the northern perimeter of the site. The regional location of the Project site is shown in Figure 1, *Regional Location*.

The Project site is bordered by Batavia Street to the east, north of Walnut Avenue, east of Main Street, and south of Collins Avenue. The Project site consists of a single parcel encompassing 3.22 acres. The parcel is identified as Assessor's Parcel Numbers (APN) 386-542-01. Local access to the site is provided by Batavia Street which is classified as a primary arterial. The Project site and the surrounding area are shown in Figure 2, *Local Vicinity*.

Existing Site Conditions

The Project site encompasses a single parcel totaling approximately 3.22 acres. An aerial of the site is provided as Figure 3, *Aerial*. The site is relatively flat with limited landscaping located along the northern and eastern perimeters of the site. The site is currently developed with two vacant light manufacturing buildings and a covered storage area. The existing buildings are 26,078 SF and 21,854 SF with a combined total of 47,932 SF. The 26,078 SF westernmost building is two-stories with metal wall panels. The 21,854 SF easternmost building has a brick and white stucco façade along the street frontage and is largely single-story with two-stories at the northeast corner. The buildings are located on the south end of the property and the northern portion of the property is paved, generally flat, and is striped for parking. Access to the site is provided via a single driveway at the northeast corner of the site along Batavia Street. Existing site conditions are shown in Figure 4, *Site Photos*.

Existing Land Uses and Zoning Designation

The Project site has a General Plan land use designation of Light Industrial (LI) and zoning designation of Industrial Manufacturing (M-2), as shown on Figure 5, *Existing General Plan Designations,* and Figure 6, *Existing Zoning Designations*. The LI General Plan land use designation allows a floor area ratio (FAR) of up to 1.0 and a 3-story building height limit. The General Plan states that LI land use designation is intended for "Manufacturing, processing, and distribution of goods. Wholesale activities associated with industrial operations, as well as small-scale, support retail, service commercial and office uses may also be established in areas with ready access to major circulation routes." Allowable uses within the M-2 zone include but are not limited to autobody related services, parking structures, warehouses, and self-storage as discussed in Section 17.13.030 of the Municipal Code.

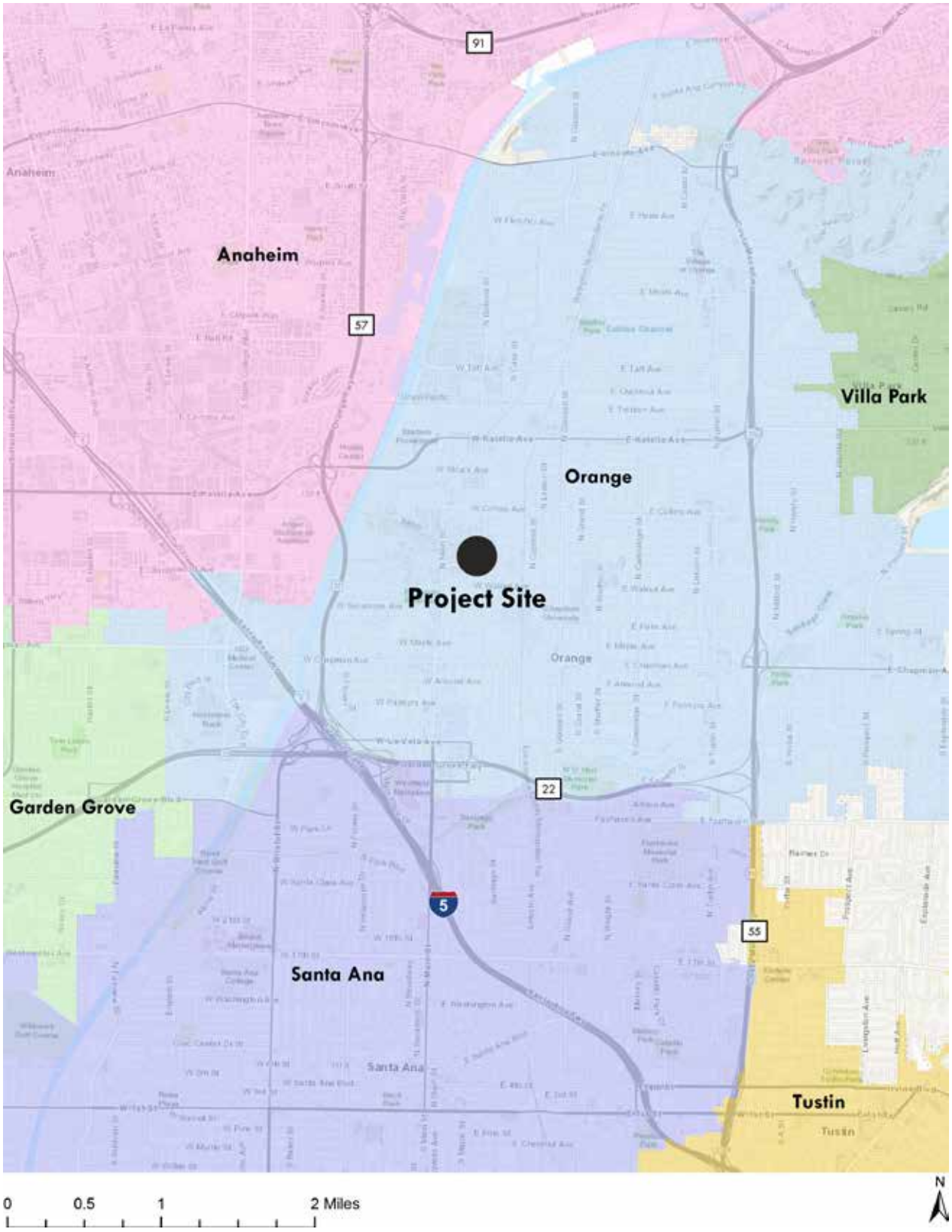
Surrounding Land Uses

The Project site is an urban infill site located within a developed industrial area. The surrounding land uses are described in Table 1.

Table 1: Surrounding Existing Land Use and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning
North	The Atchison, Topeka, and Santa Fe Railway is located directly north of the site followed by light industrial buildings.	LI	M-2
West	An industrial facility occupied by ReadyRefresh Contactless Delivery is located directly west of the site.	LI	M-2
South	A business park with tenants such as Bridge Associates and Site One Landscape Supply is located south of the Project site.	LI	M-2
East	Batavia Street is located directly east of the site followed by an industrial building occupied by Show Fleet.	LI	M-2

Regional Location



630 Batavia
City of Orange

Figure 1

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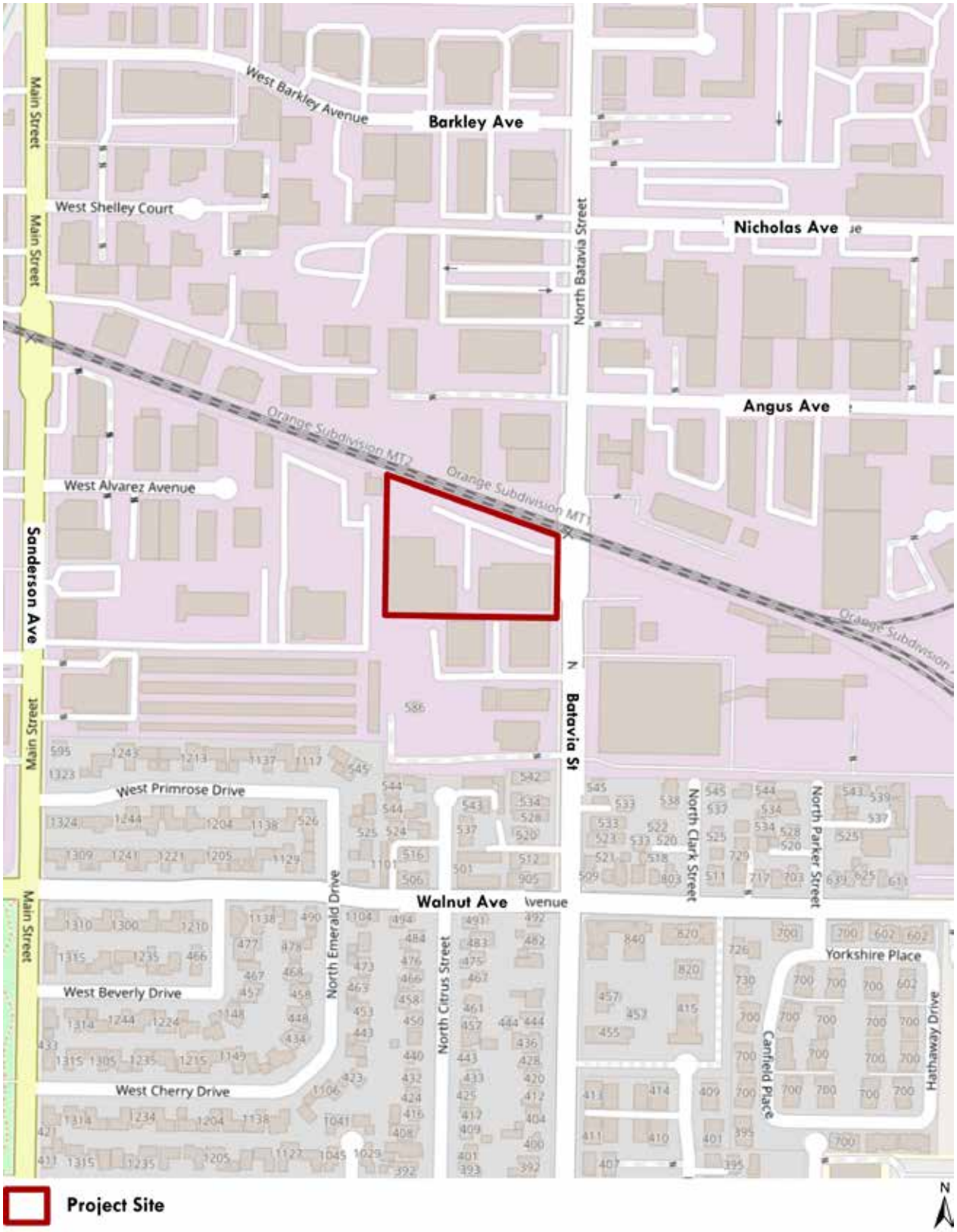
Local Vicinity



630 Batavia
City of Orange

Figure 2

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Aerial View

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Figure 3

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Existing Site Photos

View from the northeast corner of project site at the railroad crossing on Batavia St.

Existing structure viewed from Batavia St.

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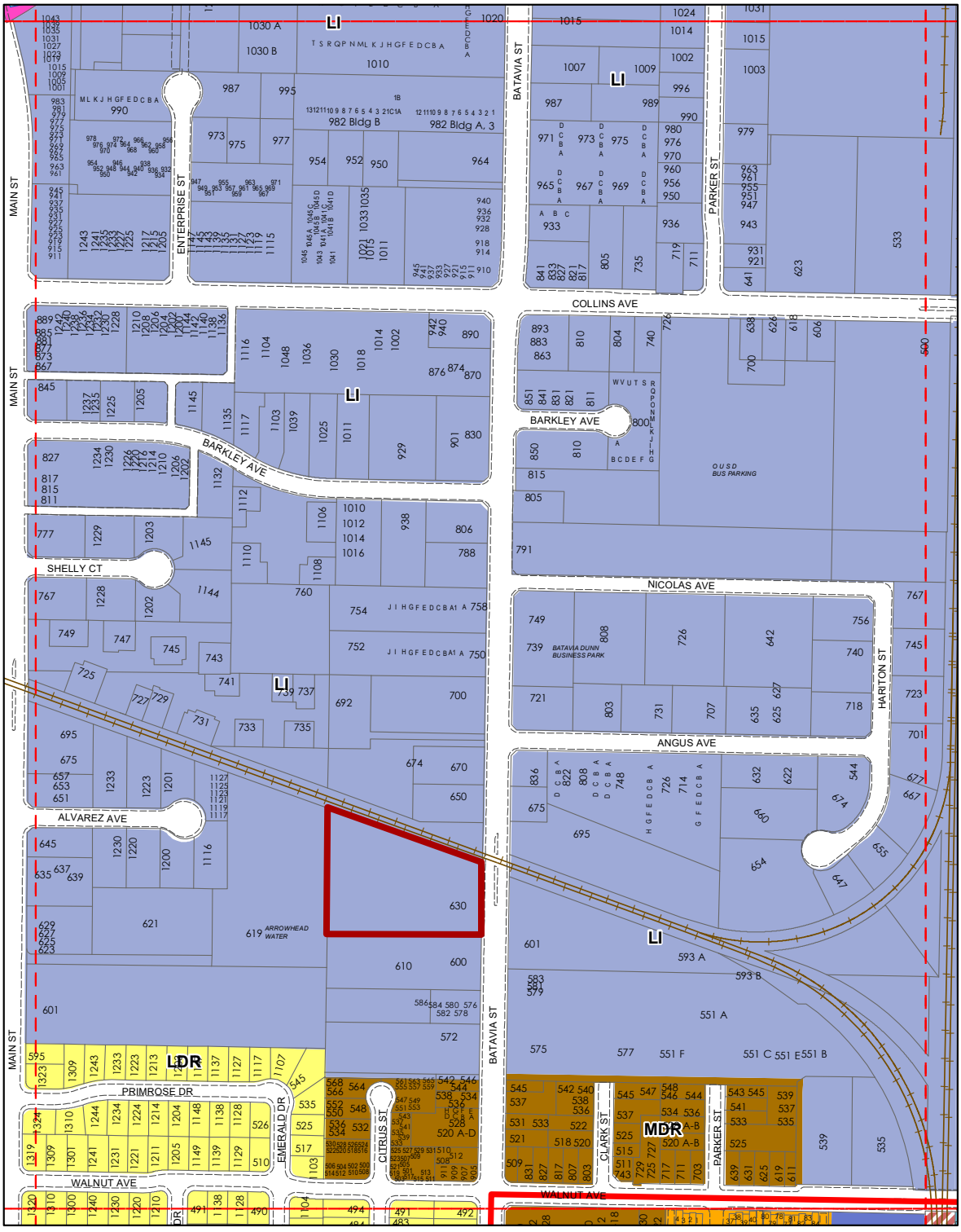
Existing General Plan Designation



Project Site

LI - Light Industrial

LDR - Low Density Residential

MDR - Medium Density Residential

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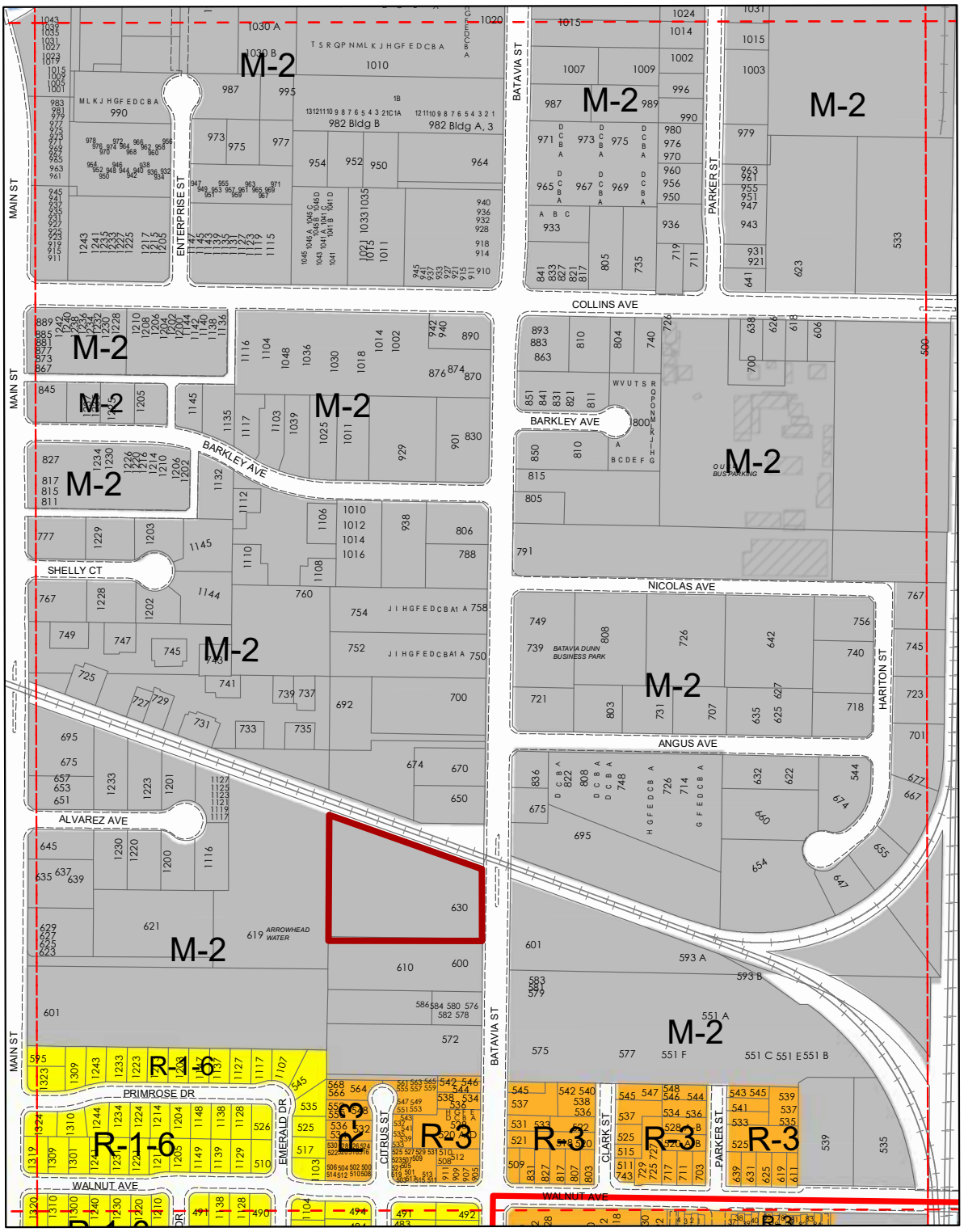
Existing Zoning



Project Site

M-2 - Industrial Manufacturing District

R-1-6 - Single-Family Residential District

R-3 - Multiple-Family Residential District

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City of Orange

Figure 6

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PROJECT DESCRIPTION

Project Overview

The applicant for the Project is requesting approval from the City of Orange to demolish the existing 47,932 SF of existing structures and construct three new self-storage buildings totaling 133,372 SF, measuring a maximum of 41-feet-4-inches in height and totaling a FAR of 1.0. The Project includes the construction of associated parking, landscaping, and utility improvements to serve the site. The site plan is shown on Figure 7, *Conceptual Site Plan*. The Project requests the approval of a Major Site Plan Review and Design Review for consideration of the architectural design, conceptual landscaping, and overall compliance with the City's zoning regulations.

Project Features

Development Summary

The Project consists of three self-storage buildings totaling 133,372 SF. Building A would be approximately 8,693 SF, Building 2 would be approximately 105,711 SF inclusive of 1,044 SF of office space, and Building C would be approximately 18,968 SF.

Building A would be located along the northern end of the site and would be single-story. Building B would be located at the center of the site and would be a 3-story building. The office would be attached to the eastern end of Building B. Building C would be located along the southern and western ends of the site and would also be single-story. As shown in Figures 8a-c, *Elevation*s, Buildings A and C would measure a maximum of 15-feet, 2-inches and Building B would measure a maximum of 41-feet, 4-inches. The buildings would establish an architectural presence through an emphasis on building finish materials and consistent material usage and color scheme. The buildings would be tan and grey with red brick, black canopies, and green accents. The proposed building would be designed to draw from some of the historic building themes within the City. As such, the building would incorporate brick as a key decorative element which is seen in some of the early commercial buildings in the City.

Each building would contain a mix of non-climate-controlled and climate-controlled storage units ranging from 5 feet by 4 feet to 20 feet by 21 feet and lockers ranging from 5 feet by 5 feet to 5 feet by 7 feet. A breakdown of the unit and locker mixes are shown in Table 2 below.

Table 2: Conceptual Unit Mix Tabulation

	Building A		Building B – 1st Floor		Building B – 2nd Floor		Building B – 3rd Floor		Building C		Total
	Non-Climate	Climate Control	Non-Climate	Climate Control	Non-Climate	Climate Control	Non-Climate	Climate Control	Non-Climate	Climate Control	All
Storage Units	33	10	54	116	0	318	0	318	52	95	996
Lockers	0	0	0	270	0	0	0	0	0	0	270
Total	33	10	54	386	0	318	0	318	52	95	1,266
Non-Climate Control (Regular Units)											139
Climate Control Units											1,127
Total											1,266

As shown on Figure 7, *Conceptual Site Plan,* an approximately 45-foot minimum setback would be provided along Batavia Street, which exceeds the 20-foot minimum setback. The Municipal Code does not require the proposed buildings to be set back from the rear and interior property lines, though the proposed buildings would be set back from the north, south, and west property lines and would not sit at the property lines.

Parking and Loading Summary

The Project would provide a total of 44 vehicle parking spaces including 5 standard parking stalls, 21 parallel parking stalls, 1 ADA-accessible stall, 1 electric vehicle ready stall, and 2 clean air stalls. The Project would also include 6 loading zone stalls, 14 RV parking stalls, and 6 bike parking spaces. The 14 RV parking stalls could also be utilized as vehicle parking stalls for additional onsite parking when not in use for RV parking. All proposed parking would be surface parking.

Landscaping

The Project would include ornamental landscaping along the street frontage and along the northern perimeter of the site. As depicted in Figure 9, *Conceptual Landscaping Plan*, landscaping would include 24-inch box trees and 36-inch box trees, 1 to 15-gallon shrubs, and groundcover. The Project would include a minimum of 20 feet of landscaping setback along the Batavia Street frontage.

Fencing and Walls

The Project would construct a 6-foot-high concrete masonry unit (CMU) wall along the northwest corner of the site around the drainage equipment. To secure the storage units, 7-foot-high metal swing gates would be located near the eastern ends of Buildings A and C. The gates would include a Knox padlock to allow access for emergency vehicles.

Infrastructure Improvements

Water and Sewer Improvements

The Project applicant would install onsite water lines that would connect to the existing 2-inch diameter domestic water line, 0.75-inch diameter irrigation water line, and 8-inch fire service line located at the property line fronting Batavia Street as well as install an additional 8-inch fire service in Batavia Street, providing a loop onsite to service the proposed fire hydrants. The Project would also install an onsite sewer line, connecting to the existing 6-inch service line at the property line fronting Batavia Street.

Drainage/Water Quality Improvements

The Project proposes a private storm drain system on the site that would drain via gutter flow towards the northwest corner of the site. Stormwater would be captured via grated inlets and stored in an underground 48-inch high-density polyethylene (HDPE) storage pipe. The stormwater would then be pumped to a Modular Wetland System for treatment where, once treated, it would be discharged to a brow ditch along the northerly property line and ultimately drain to the northwest corner of the site in accordance with City Low Impact Development (LID) requirements.

Construction

Construction activities would last approximately 13 months and are expected to begin in the 4th Quarter of 2023. Project construction would take place in one phase and include site preparation, demolition, grading, building construction, architectural coating, and paving, as shown in Table 3. All off-road diesel construction equipment greater than 50 horsepower (>50 HP) used for construction of the Project would

be California Air Resources Board (CARB)-certified Tier 3 Final or higher, as verified through City permitting for the Project.

Construction would occur within the hours allowed by City of Orange Municipal Code Section 8.24.050, which states that construction shall occur only between the hours of 7:00 AM and 8:00 PM Monday through Saturday, or between the hours of 9:00 AM and 8:00 PM on Sunday or a Federal holiday.

Table 3: Estimated Construction Schedule

Construction Phase	Working Days
Demolition	15
Site Preparation	15
Grading	10
Building Construction	230
Paving	10
Architectural Coatings	115

Operation

The Project would be operated as three self-storage buildings with an ancillary office use. Typical operational characteristics include employees traveling to and from the site and lessees traveling to and from the site to deliver and retrieve belongings from their storage units. In order to provide a conservative environmental analysis, storage operations were assumed to be 24 hours a day, 7 days a week.

Discretionary Actions

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

City of Orange

- Major Site Plan Review
- Design Review
- Adoption of this Mitigated Negative Declaration
- Approvals and permits necessary to execute the Project, including but not limited to, demolition permit, grading permit, building permit, etc.

Scheduled Public Meetings or Hearings:

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

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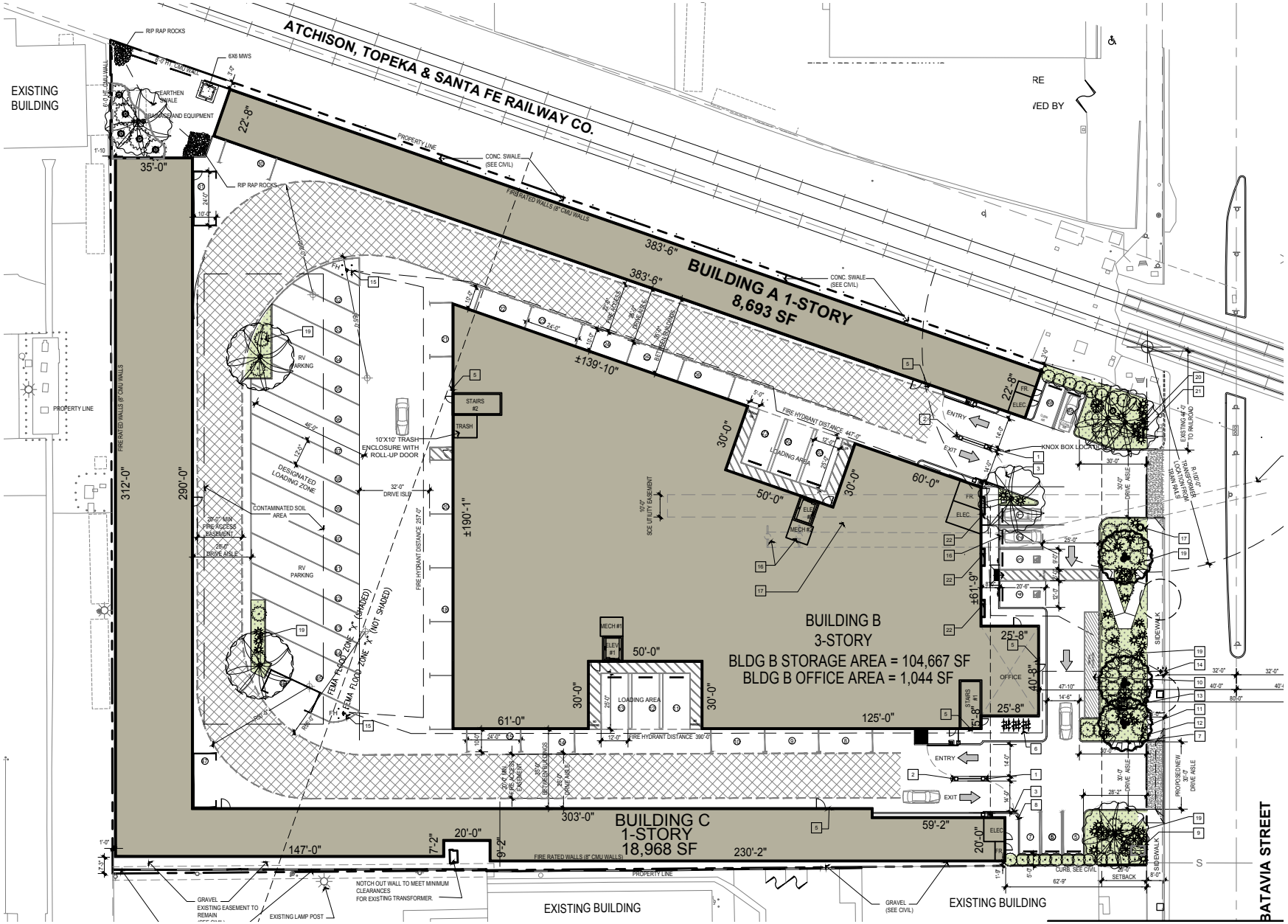
Conceptual Site Plan



630 Batavia
City of Orange

Figure 7

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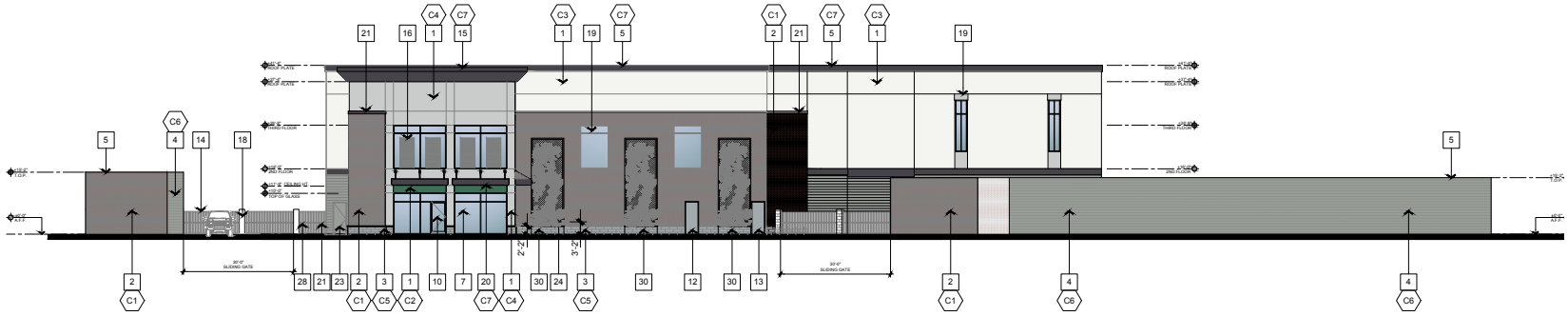
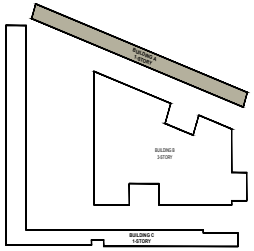
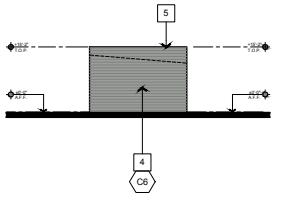
Elevations Building A



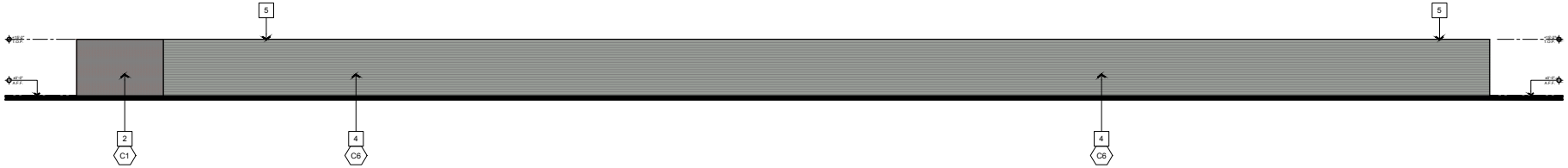
BLDG C/B/A - OVERALL EAST ELEVATION 1



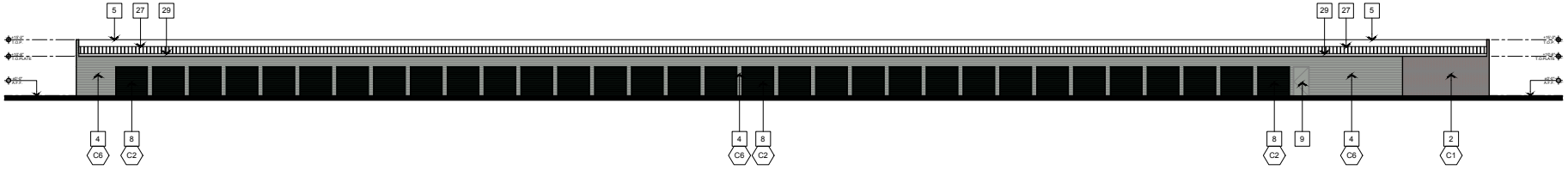
KEY PLAN N/A 5



BLDG A - WEST ELEVATION 2



BLDG A - NORTH ELEVATION 3



BLDG A - SOUTH ELEVATION 4

630 Batavia
City of Orange

Figure 8a

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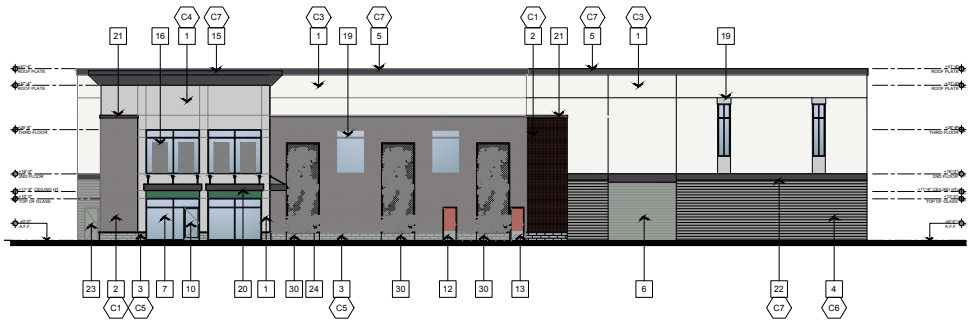
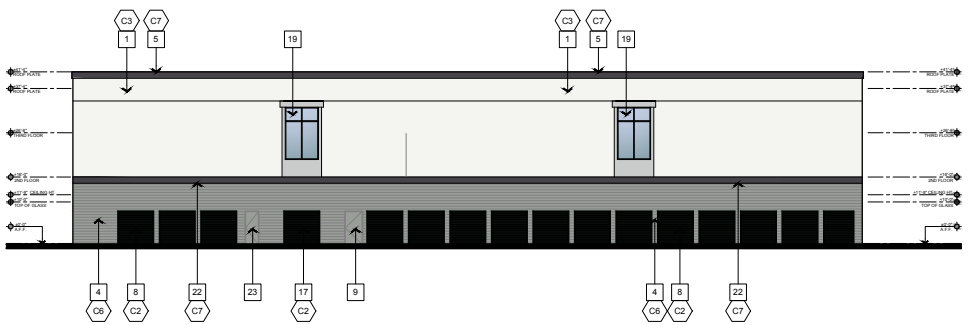
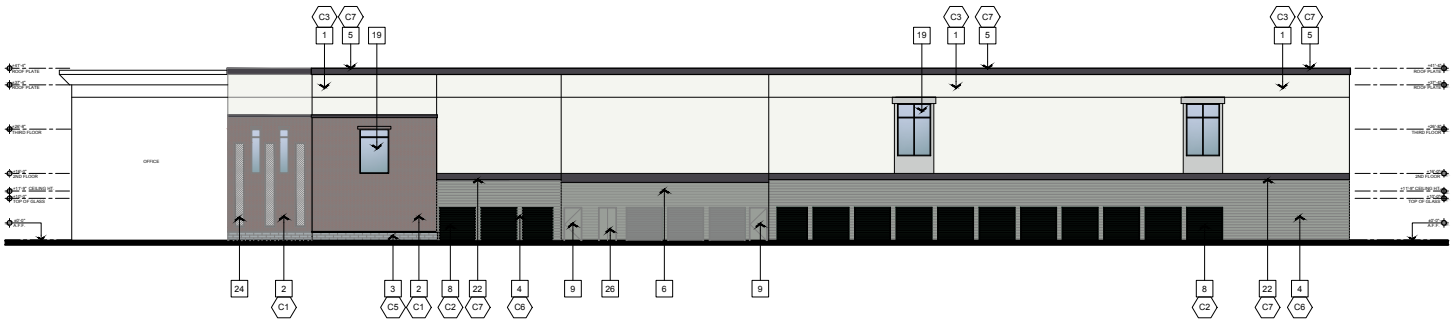
Elevations Building B



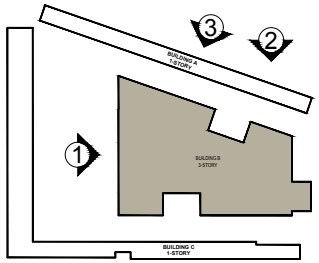
BLDG B - WEST ELEVATION 1



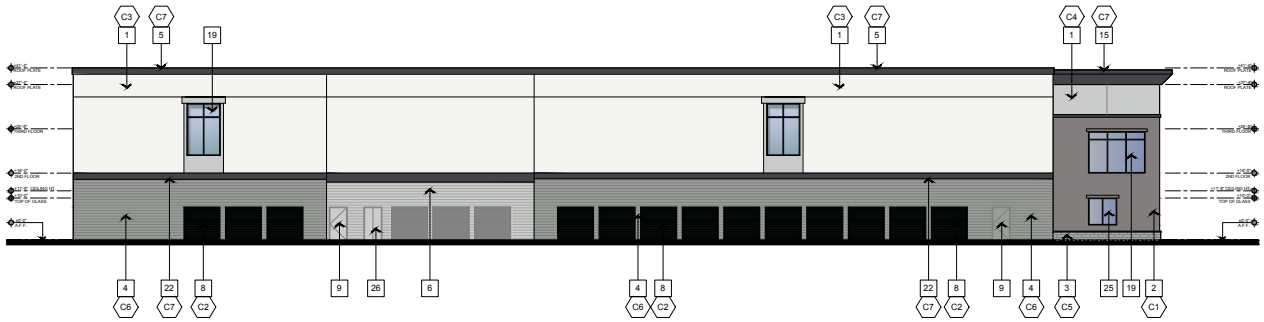
BLDG B - EAST ELEVATION 1



BLDG B - NORTH ELEVATION 3



KEY PLAN N/A 4



BLDG B - SOUTH ELEVATION 3

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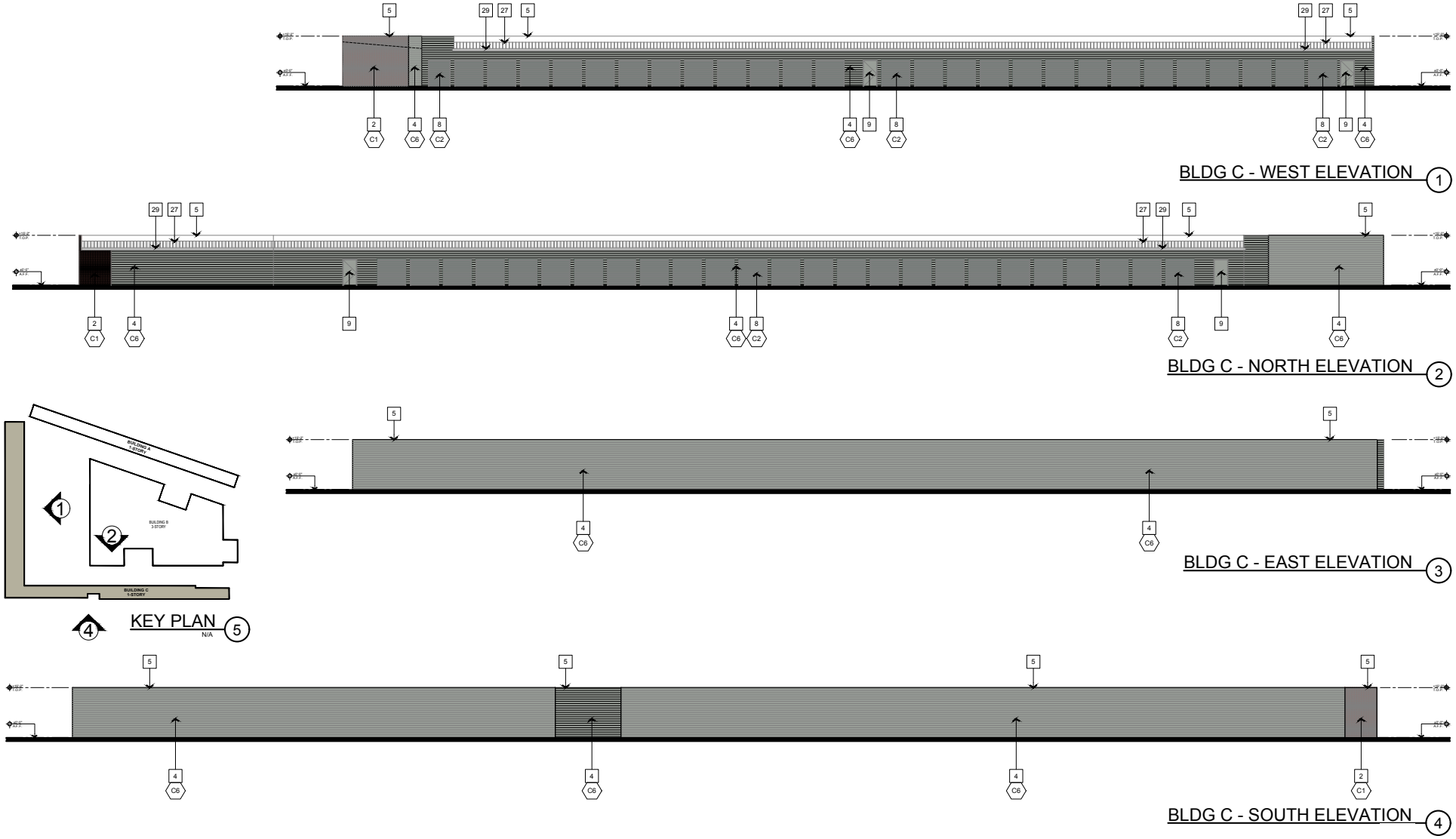
Elevations Building C



630 Batavia
City of Orange

Figure 8c

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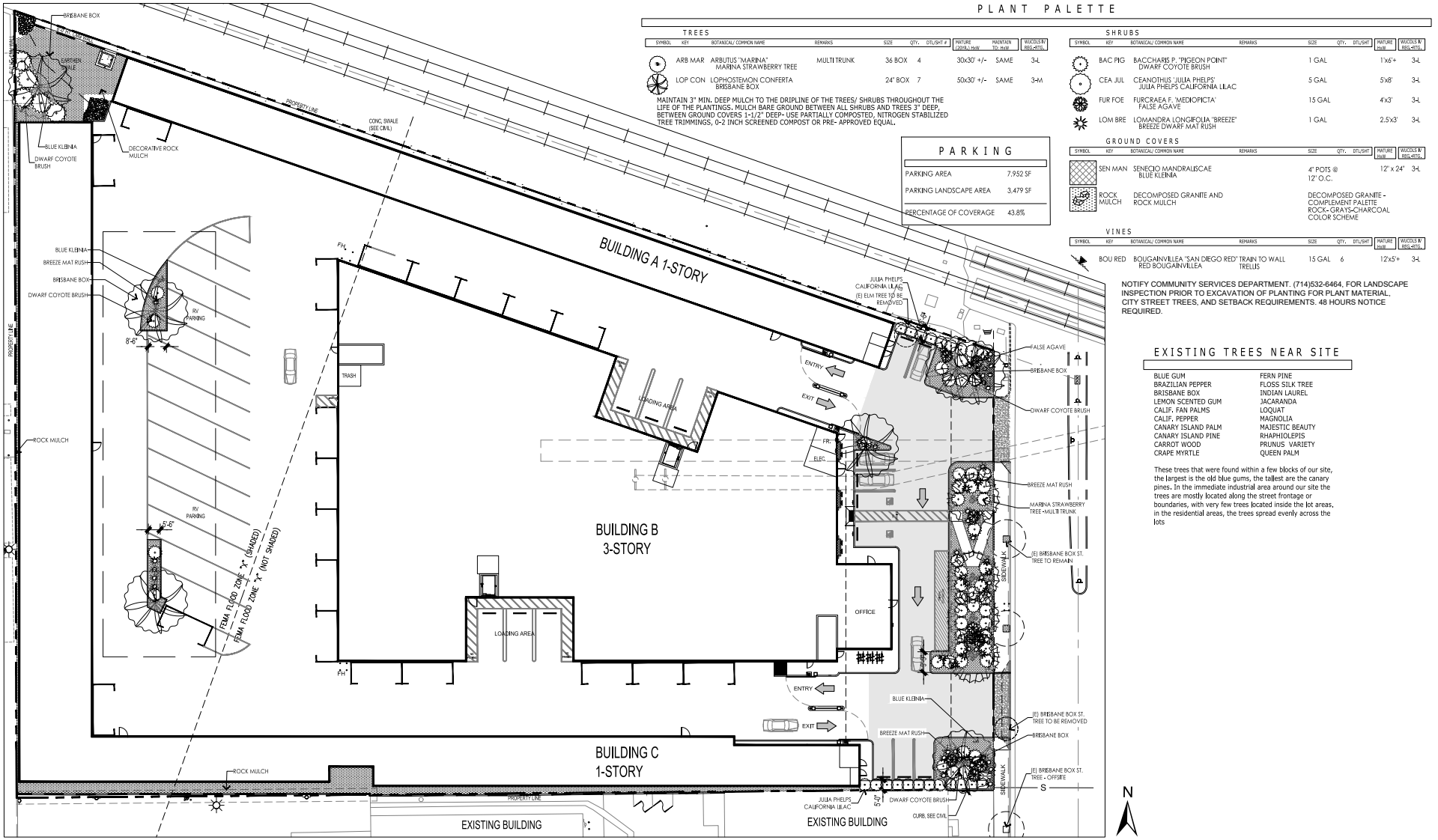
Conceptual Landscaping Plan



630 Batavia
City of Orange

Figure 9

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION. On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐

2. I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☒

3. I find the Project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

4. I find that the Project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐

5. I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the Project, nothing further is required. ☐

Arlen Beck

Arlen Beck, Associate Planner

11/8/2023

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced, as discussed below).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identity the following:

   a. Earlier Analysis Used. Identify and state where they are available for review.

b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated", describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:
a) the significance criteria or threshold, if any, used to evaluate each question; and
b) the mitigation measure identified, if any, to reduce the impact to less than significance.

CHECKLIST OF ENVIRONMENTAL IMPACT ISSUES:

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

Impact Analysis

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

The City's General Plan defines scenic vistas as those "...hillsides, ridgelines or open space areas that provide a unifying visual backdrop to the urban environment." The Project site is in an urbanized area where views are limited due to the surrounding industrial developments. Distant views of the surrounding foothills of the Puente Hills are available from public vantage points on Batavia Street.

The Project site is currently developed with two industrial structures, parking, and ornamental landscaping on the northern property border. The Project would develop three self-storage buildings and an office measuring a maximum of 40-feet, 10-inches in height with building setbacks of 20 feet or greater, in compliance with Municipal Code Section 17.20.080, *Building Height* and Section 17.20.090, *Yard Requirements*. Therefore, the proposed storage facilities would not impede any views of the mountains and foothills from pedestrians and motorists along Batavia Street. As the Project would not impact any scenic vistas or protected viewsheds, and the Project is consistent with surrounding uses and City development standards, no impacts would occur.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

b) There are no officially designated state scenic highways in the vicinity of the Project site (Caltrans, 2022). The nearest officially designated scenic highway is SR-91, approximately 3.75 miles northeast of the Project site. The City's General Plan identifies portions of Santiago Canyon Road, Jamboree Road, and Newport Boulevard as potential City scenic highways. However, these routes are not located within the vicinity of the Project site. Therefore, impacts to scenic resources within a state scenic highway would not occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

c) The Project site is located within a mixed industrial, commercial, and residential area and is located adjacent to industrial developments. The site is currently developed with two light manufacturing buildings and a covered storage area. The existing buildings are located in the southern portion of the site and the northern portion of the property is paved and striped for parking. The existing character of the Project site is neither unique nor of special aesthetic value or quality. Temporary changes to the visual character from construction activities, including construction equipment and staging would be short-term and would change as construction proceeds.

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

Table AES-1: Project Consistency with Site Development Standards

Development Feature	M-2 Zoning Requirement	Project Consistency
Exterior Front, Side, Rear Setbacks: Adjacent to alley or Residential Adjacent to Arterial Street Adjacent to Local Street Interior Side and Rear Setbacks	 20 ft 20 ft 10 ft 0 ft	**Consistent.** The Project would provide a front landscape setback of 20 feet from Batavia Street (arterial street).
Maximum Height: Within 50 Feet of Residential Districts All Other Locations	 20 ft 45 ft	**Consistent.** The Project would have a maximum height of 41-feet, 4-inches. The parcels surrounding the Project do not contain residential structures.

Landscaping	Requirements listed in the Landscape Standards and Specifications	**Consistent.** The Project would adhere to all landscaping requirements in the City included in the Landscape Standards and Specifications and would include 8,307 SF of landscaping.
Maximum Floor Area Ratio (FAR)[1]	1.0	**Consistent.** The Project would have a FAR of 1.0

[1]Based on General Plan land use standards for Light Industrial areas

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

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

d) The Project site is located within a developed urban area, adjacent to industrial uses. Existing sources of light on and in the vicinity of the Project site include streetlights, security lighting, landscape lighting, and lighting from building interiors that pass through windows.

Although the Project would create a new source of light and glare during operation, the Project would not adversely affect daytime or nighttime views at adjacent properties and roadways. Moreover, lighting on the Project site would be designed, located, and shielded in compliance with the City's Municipal Code Section 17.12.030. Proposed changes to lighting would be verified by the Orange Police Crime Prevention Bureau during the permitting process. Therefore, the light that would be generated by the Project would not adversely affect day or nighttime views in the area. Overall, lighting impacts would be less than significant.

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. Generally, dark or mirrored glass would have a higher visible light reflectance than clear glass. Buildings constructed of highly reflective materials from which the sun reflects at a low angle can cause adverse glare. The Project would use blue reflective glazing on portions of the north, east, and south elevations of Building B; however, the majority of the buildings would not include reflective material. Pursuant to Municipal Code 17.12.030, exterior lighting would be shielded or oriented to prevent glare beyond the exterior boundaries of the property. With compliance to City regulations, the Project's impacts related to light and glare would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

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

Sources

Caltrans (California Department of Transportation). 2019. *List of eligible and officially designated State Scenic Highways*. [online]: http: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed May 2023.

City of Orange General Plan. [online]: https://www.cityoforange.org/391/General-Plan. Accessed May 2023.

City of Orange Municipal Code. 2022. [online]: https://library.qcode.us/lib/orange_ca/pub/municipal_code. Accessed May 2023.

	2. AGRICULTURE & FOREST RESOURCES. *(In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.) In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.) Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Impact Analysis:

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

DOC (California Department of Conservation). 2022. Important Farmland Finder. [online]: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed May 2023.

City of Orange General Plan. [online]: https://www.cityoforange.org/391/General-Plan. Accessed May 2023.

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

The discussion below is based on the Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report, prepared by LSA in April 2023 (included as Appendix A).

Impact Analysis:

a) The Project site is located in the South Coast Air Basin (Basin), which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The 2022 AQMP details goals, policies, and programs for improving air quality in the Basin[1]. The 2022 AQMP is based on regional growth projections developed by SCAG[2].

As described in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993)[3], two criteria are used to analyze consistency with the AQMP. First, if a proposed project would result in growth that is substantially greater than what was anticipated in the AQMP, then the proposed project would conflict with the AQMP and SCAQMD's attainment plans. On the other hand, if a project's density would be within the growth anticipated by the AQMP, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. Second, the SCAQMD considers a project consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

Regarding the first criterion, the Project would develop three self-storage buildings totaling 133,372 SF within an area designated by the General Plan as Light Industrial. Self-storage facilities are an allowed use under the Light Industrial land use designation, which is intended for manufacturing, processing, and goods distribution. Both the General Plan and the General Plan Program EIR assumed that the Project site would be developed with uses pursuant to the Light Industrial land

[1] 2022 Air Quality Management Plan. Available online at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16

[2] See page 3-28 of the 2022 Air Quality Management Plan.

[3] South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Available online at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (accessed March 2023).

use designation, which allows for a maximum FAR of 1.0. The Project would be developed to a FAR of approximately 1.0, which is consistent with the Light Industrial designation for the site. Therefore, Project-generated emissions would be consistent with what was assumed under the 2022 AQMP.

The Project is not defined as a regionally significant project as defined under CEQA Guidelines Section 15206[4]: the Project would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 SF of floor area. Thus, the Project would not meet SCAG's Intergovernmental Review criteria nor require additional review of consistency to SCAG's adopted regional plans. As such, the Project would be consistent with projected growth, as envisioned by SCAG.

In addition, as described in Response 3(b) below, the Project would not generate air quality emissions above SCAQMD significance thresholds during construction or operation. Therefore, the Project's potential impacts related to a conflict with the AQMP would be less than significant.

Significance Determination: Less than significant.
Mitigation Measures: No mitigation required.
Significance Determination After Mitigation: Less than significant.

b) The Basin has been assigned a non-attainment status due to its failure to meet federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the Basin, including the Project, could cumulatively contribute to these pollutant violations. SCAQMD has established daily mass thresholds for regional pollutant emissions, listed in Table AQ-1. The methodologies from the SCAQMD CEQA Air Quality Handbook have been used to evaluate the Project's potential impacts. According to these methodologies, a project projected to generate emissions exceeding any of the listed thresholds would have both an individually (project-level) and cumulatively significant air quality impact. If the project's estimated emissions would be less than the thresholds, or would be reduced to below the thresholds with implementation of mitigation, then its impacts would be considered less than significant[5].

Table AQ-1: Maximum Daily Regional Emissions Thresholds

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

[4] CEQA Statutes and Guidelines. 2023. Section 15206: https://www.califaep.org/docs/CEQA_Handbook_2023_final.pdf
[5] South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Available online at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (accessed March 2023).

lbs/day = pounds per day
VOCs = volatile organic compounds
NO_x = nitrogen oxides
CO = carbon monoxide
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SO_X = sulfur oxides

Source: Appendix A

Construction

Construction associated with the Project would generate pollutant emissions from the following activities: (1) demolition of existing structures, foundations, and pavement; (2) site preparation; (3) grading; (4) building construction; (5) paving; and (6) architectural coating/striping. The level of emissions generated on a daily basis would vary, depending on the intensity and the types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to: applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 and Rule 1113, included as PPP AQ-2 and PPP AQ-3, respectively, were accounted for in the construction emissions modeling for the Project. Project-generated emissions were calculated using CalEEMod version 2022.1. More detailed information regarding the calculation of the Project's construction emissions, including the mix of construction equipment, are included in Appendix A to this IS/MND.

As shown in Table AQ-2, *Construction Emissions Summary*, onsite and offsite construction emissions generated by the Project would not exceed SCAQMD regional thresholds. Hauling trips associated with the Project would utilize the City's approved truck routes which would be oriented away from sensitive receptors. Therefore, the Project's estimated emissions from construction activities would result in less than significant project-level and cumulative impacts.

Table AQ-2: Construction Emissions Summary

Project Construction	Maximum Pollutant Emissions (pounds per day)					
	VOCs	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition	0.8	20.9	20.5	0.1	4.9	1.5
Site Preparation	1.0	24.1	29.3	<0.1	8.8	4.8
Grading	0.8	25.0	23.2	0.1	5.7	2.6
Building Construction	0.7	12.9	17.9	<0.1	1.4	0.7
Paving	0.3	7.2	9.9	<0.1	0.6	0.4
Architectural Coating	10.9	1.1	1.5	<0.1	0.2	0.1
Maximum Daily Emissions	**11.6**	**25.0**	**29.3**	**0.1**	**8.8**	**4.8**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Maximum emissions of VOCs occurred during the overlapping building construction, paving, and architectural coating phases.

CO = carbon monoxide; lbs/day = pounds per day; NOX = nitrogen oxides; PM2.5 = particulate matter less than 2.5 microns in size; PM10 = particulate matter less than 10 microns in size; SCAQMD = South Coast Air Quality Management District
SOX = sulfur oxides; VOCs = volatile organic compounds
Source: Appendix A

Operation

Long-term air pollutant emission impacts are typically those associated with mobile sources (e.g., vehicle and truck trips), energy sources (e.g., natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), and stationary sources (e.g., use of the backup emergency generator and fire pump).

PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of PM emissions compared with diesel-powered vehicles.

Energy source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. Greater building or appliance efficiency reduces the amount of energy for a given activity and thus lowers the resultant emissions. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources. However, the Project would not include natural gas connections, and no natural gas demand is anticipated during operation. Typically, area source emissions consist of direct sources of air emissions located at the Project site, including architectural coatings and the use of landscape maintenance equipment. Stationary sources are associated with the use of the backup emergency generator and fire pump.

As shown in Table AQ-3, *Operational Emissions Summary*, the Project's estimated operations emissions would not exceed the significance criteria for mass VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, the Project's estimated emissions from operations activities would result in less than significant project-level and cumulative impacts.

As such, the Project would not have a significant effect on regional air quality and would not result in a cumulatively considerable net increase of any criteria pollutant for which the Basin is nonattainment under an applicable federal or state ambient air quality standard. Potential impacts would be less than significant.

Table AQ-3: Operational Emissions Summary

Operational Activity	VOCs	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile Sources	0.7	0.6	5.6	<0.1	0.5	0.1
Area Sources	4.1	<0.1	5.8	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Proposed Project Emissions	**4.8**	**0.6**	**11.4**	**<0.1**	**0.5**	**0.1**
SCAQMD Significance Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

CO = carbon monoxide, lbs/day = pounds per day; NOx = nitrogen oxides; PM2.5 = particulate matter less than 2.5 microns in size; PM10 = particulate matter less than 10 microns in size; SCAQMD = South Coast Air Quality Management District; SOX = sulfur oxides; VOCs = volatile organic compounds
Source: Appendix A

Significance Determination: Less than significant.
Mitigation Measures: No mitigation required.
Significance Determination After Mitigation: Less than significant.

c) Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units[6]. The closest sensitive receptors to the Project site are single-family and multi-family residences located approximately 330 feet to the south of the Project site boundary.

Localized Significance Analysis
The SCAQMD's *Final Localized Significance Threshold Methodology* recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of a project site[7]. Such an evaluation is referred to as a localized significance threshold (LST) analysis. SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NOx, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the Basin. The Project site is located in SRA 17, Central Orange County.

As shown in Table AQ-4, *Localized Construction Emissions Summary (lbs/day)*, the maximum daily construction emissions from the proposed Project would not exceed any of the applicable SCAQMD LST thresholds. Therefore, the Project's construction emissions would result in a less than significant impact related to localized emissions.

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

Source	NOx	CO	PM_{10}	$PM_{2.5}$
Onsite Project Emissions	25.0	29.3	8.8	4.8
LST Thresholds	**153.0**	**2,036.0**	**45.0**	**13.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Notes: lbs/day = pounds per day; NOx = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM10 and PM2.5 = particulate matter
Source: Appendix A

Furthermore, as demonstrated in Table AQ-5, *Localized Operational Emission Estimates (lbs/day)*, the Project's operational emissions would not result in a significant effect related to localized emissions.

[6] See page 2 of the Air Quality and Land Use Handbook: A Community Health Perspective, April 2005. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf
[7] South Coast Air Quality Management District. Final Localized Significance Threshold Methodology. July 2008. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

Table AQ-5: Localized Operational Emission Estimates (lbs/day)

Source	NOx	CO	PM_{10}	$PM_{2.5}$
On-Site Project Emissions	<0.1	6.1	<0.1	<0.1
LST Thresholds	**160.0**	**2,448.0**	**14.0**	**4.6**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Notes: lbs/day = pounds per day; NOx = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM10 and PM2.5 = particulate matter
Source: Appendix A

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

Diesel Construction Health Risk Assessment

A construction health risk assessment (HRA) was performed for the Project, which evaluated the health risk from diesel particulate matter (DPM) to off-site receptors. A HRA analyzes the cancer risk resulting from a proposed project to the nearest sensitive receptors. The cancer risk estimates for onsite residents use a 30-year exposure duration and the cancer estimates for workers use a 25-year exposure duration[8]. The residential receptor maximally exposed individual (MEI) includes the single-family and multi-family residences located 330 feet south of the Project site, the school receptor is Sycamore Elementary School located approximately 1,830 feet southwest of the Project site, and the closest worker receptors immediately surrounding the Project site.

Table AQ-6, *Health Risks from Project Construction to Off-Site Receptors*, reports the results of the construction HRA analysis assuming the use of Tier 3 construction equipment, as proposed by the Project.

Table AQ-6: Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	6.94	0.007	0.000
School Receptor Risk	1.46	0.081	0.000
Worker Receptor Risk	0.67	0.001	0.000
SCAQMD Significance Threshold	10 in one million	1.0	1.0
Significant?	**No**	**No**	**No**

Source: Appendix A

The cancer risk at the nearest residential receptor would be 6.94 in one million, which would not exceed the SCAQMD cancer risk of 10 in one million. Additionally, the school receptor risk would be 1.46 in one million and the worker receptor risk would be 0.67 in one million, which would also not exceed the SCAQMD thresholds. The total chronic hazard index would be 0.007 for the residential receptor risk, 0.081 for the school receptor risk, and 0.001 for the worker receptor risk. In addition, the total acute hazard index would be 0.000 as shown in the table above, which is nominal and would not exceed the 1.0 threshold. As such, the proposed Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity, and impacts would be less than significant.

[8] Office of Environmental Health Hazard Assessment. Air Toxics Hot Spots Program, Guidance Manual for Preparation of Health risk Assessments. Available online at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. (Accessed June 2023)

As the Project is proposed as a self-storage facility, trucking activities would not be associated with the Project and therefore, an operational health risk assessment is not required by CARB[9]. Only personal vehicles would be associated with operation of the Project, with employees and lessees traveling to and from the site. As the Project would generate fewer trips than the existing use as described in Section 17(a), the Project would result in lower mobile source emissions and therefore no significant impacts in relation to related health risks from operation of the self-storage buildings.

Based on the results of the LST and HRA analyses, the Project would result in less than significant human health and cancer risk impacts to nearby residences. Therefore, potential impacts related to the exposure of substantial pollutant concentrations to sensitive receptors would be less than significant.

Significance Determination: Less than significant.
Mitigation Measures: No mitigation required.
Significance Determination After Mitigation: Less than significant.

d) The Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals[10].*

The SCAQMD lists land uses primarily associated with odor complaints as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities[11].

During construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. Once operational, the Project would not be a source of odors, as it would not include any activities or operations that would generate objectionable odors. The Project would also be required to comply with SCAQMD Rule 402, as included in PPP AQ-1, which would prevent occurrences of public nuisances. Therefore, potential impacts odors associated with the Project would be less than significant.

Significance Determination: Less than significant.

[9] See Table 1-1 on page 4 of the Air Quality and Land Use Handbook: A Community Health Perspective. Available online at: https://files.ceqanet.opr.ca.gov/221458-6/attachment/UNr-g159CW-r0G4DR8q6daNdAKT3RJTd8gGQCfz4wqFfl-eNdZNQEqjf8tfls1x6Gsae7YqpXwtFIZBd0. (Accessed June 2023).
[10] Air Quality Management District Rule 402. Available online at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf?sfvrsn=4. (Accessed June 2023).
[11] South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Available online at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (Accessed March 2023).

Mitigation Measures: No mitigation required.
Significance Determination After Mitigation: Less than significant.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

PPP AQ-2: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

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

PPP AQ-3: Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

Sources:

Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report. April 2023. Prepared by LSA. (Appendix A).

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

Impact Analysis:

a) The Project site is currently developed with two light manufacturing buildings and a covered storage area located in the southern portion of the Project site. The northern portion of the Project site is paved and striped for parking and contains only ornamental landscaping. The surrounding area is urbanized with primarily industrial-use buildings. As the Project site is fully developed and impermeable, and has been for at least 40 years, no endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) occur on the site due to lack of suitable habitat.

The Project would redevelop the site with three new self-storage buildings, which would include installation of new ornamental landscaping. As no sensitive species or habitats are currently located within the urban and developed site, implementation of the Project would not result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive species, and no impacts would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

b) Riparian habitats occur along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. As previously

described, the Project site is fully developed with industrial uses and located in an urbanized area that does not contain any riparian or riverine features. According to the National Wetlands Inventory, no riparian habitat or other sensitive natural communities occur on or adjacent to the Project site (USFWS 2022). Additionally, the Project site and adjacent areas are not included in any local or regional plans, policies, or regulations that identify riparian habitat or other sensitive natural community. Therefore, no potential impacts would occur as a result of Project's construction and operation on an already developed urban infill site.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

c) Wetlands are defined under the Federal Clean Water Act as land that is flooded or saturated by surface water or groundwater sufficient to support vegetation adapted to saturated soils. Wetlands include areas such as swamps, marshes, and bogs. As previously described, the Project site is currently fully developed with industrial uses and located in an urbanized area, and does not contain any wetlands (USFWS, 2022). Therefore, the redevelopment of the Project site would not result in impacts to wetlands.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

d) Wildlife corridors are linear features that connect areas of open space and provide animals with avenues for migration and access to additional areas for foraging. The Project site is located within an established urbanized area and is fully developed with two industrial buildings and a paved asphalt lot. The Project site is surrounded by industrial uses, a railroad, and roadways. Therefore, the Project site does not contain, and is not adjacent to, any wildlife corridors.

The Project site contains ornamental trees on the northern boundary of the site that may be utilized by nesting birds and raptors during the nesting bird season from February 1 through September 15. Consequently, the applicant has agreed to incorporate Mitigation Measure BIO-1 into the Project so that, if vegetation is required to be removed during nesting bird season, a nesting bird survey must be conducted prior to initiating any such vegetation clearing. Incorporation of Mitigation Measure BIO-1 into the Project would ensure that potential impacts related to nesting birds would be less than significant.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:
MM BIO-1: Pre-construction Nesting Bird Survey. Construction plans and Project specifications shall state that if construction or other Project activities are scheduled to occur during the bird breeding season (February through August for raptors and March through August for most migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified biologist to ensure that active bird nests will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project area and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities

shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

Significance Determination After Mitigation: Less than significant.

e) The Project contains ornamental trees in the northern portion of the site. The City participates in the [12]Orange County Natural Community Conservation Planning (NCCP) program and the Master Street Tree Plan, which are the primary local measures to protect biological resources. Municipal Code Chapter 12.28 prohibits the removal of trees, including historic trees, from undeveloped and public interest property without a permit. In addition, the removal of recognized City of Orange Street Trees must be approved by the Director of Public Works and must comply with the provisions within the Master Street Tree Plan. These requirements include replacement or relocation of trees as necessitated. The Project would not include removal of trees from an undeveloped property or a public right-of-way. With City review and approval of the proposed landscaping site plan, the Project would not conflict with local policies and potential impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance would be less than significant.

Significance Determination: Less than significant.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

City of Orange. Master Street Tree Plan. [online]:
https://www.cityoforange.org/home/showpublisheddocument/336/637699043683430000.
Accessed April 20, 2023.

[12] NCCP Plan Summary. Available Online at: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal

City of Orange. 2010. Orange General Plan Program Environmental Impact Report. [online]: https://www.cityoforange.org/home/showpublisheddocument/240/637698173340500000. Accessed April 20, 2023.

City of Orange Municipal Code. 2022. [online]: https://library.qcode.us/lib/orange_ca/pub/municipal_code/item/title_12-chapter_12_28?view=all#title_12-chapter_12_28-12_28_020. Accessed April 20, 2023.

USFWS (United States Fish and Wildlife Service). 2022. National Wetlands Inventory. [online]: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed February 21, 2023.

5. CULTURAL RESOURCES. *Would the project:*		Potentially Significant Impact	Less than Significant 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 §15064.5?	☐	☐	☒	☐
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
(c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

The discussion below is based on the Archaeological and Paleontological Resources Records Results prepared by BFSA Environmental Services in May 2023 (included as Appendix B).

Impact Analysis:

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

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

A record search from the South Central Coastal Information Center (SCCIC) was requested by Brian F. Smith and Associates, Inc., for historical resources located on or within 0.25 miles of the Project site. The search disclosed that the historic Atchison, Topeka & Santa Fe Railroad was located within 0.25 miles of the Project. In the early 1960's, a railroad spur line was constructed to connect the site to the Atchison, Topeka & Santa Fe Railroad. The spur line is no longer operational and was not found to be a significant historical resource. No historic resources were identified within the records search as located within or adjacent to the Project site. The Project site contains two business park buildings built in 1956 and 1983. The original structure built in 1956 has undergone many improvements and changes throughout its lifetime and is not considered eligible for listing as a historical resource as it has not retained its original integrity. The structure does not represent a special element of the City of Orange's history or possess a high artistic value which rises above the ordinary. The western structure built in 1983 does not meet the minimum age threshold to be considered historic in accordance with CEQA. Further, structures adjacent to the Project site are industrial buildings which do not hold any artistic value or represent a special element of the City of Orange and are not considered historic resources. Therefore, potential impacts of Project development related to historic resources would be less than significant.

Significance Determination: Less than significant.

Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant.

b) As part of the Cultural Resources Study prepared for the Project, all pertinent data within a one-quarter-mile radius surrounding the Project site area, including a review of SCCIC data, and historic photographs were researched. No previously reported archaeological resources were identified within the Project site as part of the records search with SCCIC (Appendix B). Construction of the Project would involve grading and excavation, which would involve disturbance of soils up to 5 feet deep. Because the site has previously been disturbed for the existing development on the site, there is reduced potential for the Project's development to adversely impact prehistoric resources. However, due to the alluvial fan soil discovered on site, the applicant has incorporated Mitigation Measure CUL-1 into the Project, which provides procedures to be followed in the unlikely event that potential unique archaeological resources are discovered during grading, excavation, or other construction activities. Mitigation Measure CUL-1 requires that work in the vicinity of a find be halted until the find can be assessed for significance by a qualified archaeologist to determine the appropriate treatment and documentation of the discovery (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f). Incorporation of Mitigation Measure CUL-1 into the Project would ensure that potential impacts to undiscovered archaeological resources would be less than significant.

Significance Determination: Less than significant with mitigation incorporated.

Mitigation Measures:
MM CUL-1: Incidental Discoveries. Construction plans and specifications shall state that in the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist meeting the Secretary of Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A has evaluated the find to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the resource is determined to be significant, the qualified archaeologist shall expeditiously prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The archaeologist shall also expeditiously perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated most likely descendant as needed. The report shall be submitted to the City of Orange Community Development Department, the South Central Coastal Information Center, and the State Historic Preservation Office (SHPO), if required. Prior to commencement of grading activities, the City of Orange Community Development Department shall verify that all Project grading and construction plans include specific requirements regarding Public Resources Code Section 21083.2(g) and the treatment of archaeological resources as specified herein.

Significance Determination After Mitigation: Less than significant impact.

c) The Project site is currently fully developed with industrial uses and has not previously been used as a cemetery. Thus, human remains are not anticipated to be uncovered during Project construction. In the event of an accidental discovery of any human remains, California Health and Safety Code Section

7050.5 requires that disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative. Pursuant to Section 5097.98 of the California Public Resources Code, as included as PPP CUL-1, if the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law would ensure that no impacts to human remains would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

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

Sources

Archaeological and Paleontological Resources Records Results. May 2023. Prepared by BFSA Environmental Services. (Appendix B).

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

The discussion below is based on the Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report, prepared by LSA in April 2023 (included as Appendix A).

Impact Analysis:

a)

Construction
During the 13-month construction period, energy would be consumed in the three general forms listed below. No natural gas use is anticipated during construction.

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

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

Estimates of diesel and gasoline fuel usage were based on default construction equipment assumptions and trip estimates from CalEEMod version 2022.1 and fuel efficiencies from EMFAC2021. Details regarding the estimates are provided in Appendix A. Fuel consumption estimates are shown below in Table E-1, *Estimated Project Construction Energy Usage*.

Table E-1: Estimated Project Construction Energy Usage

Energy Type	Total Energy Consumption	Percentage of Increase Countywide
Diesel Fuel (total gallons)	57,400.2	0.04
Gasoline (total gallons)	20,716.5	<0.01

Source: Appendix A

Project construction would result in the consumption of approximately 57,400.2 gallons of diesel fuel and approximately 20,716.5 gallons of gasoline. Based on fuel consumption estimates obtained from EMFAC2021, approximately 1,230 million gallons of gasoline and approximately 156 million gallons of diesel would be consumed due to vehicle trips in Orange County in 2023. Therefore, construction of the Project would increase the annual construction generated fuel use in Orange County by approximately 0.034 percent for diesel fuel usage and by less than 0.01 percent for gasoline fuel usage. As such, Project construction would have a negligible effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than that utilized at comparable construction sites in the region or the state. The Project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. Therefore, fuel consumption during construction would not be inefficient, wasteful, or unnecessary and impacts would be less than significant.

Operation

Operational energy use is typically associated with electricity consumption and gasoline and diesel fuel used for vehicle and truck trips. Energy consumption was estimated for the Project using default energy intensities by land use type in CalEEMod version 2022.1. Operational equipment would not be powered by natural gas; therefore, no natural gas demand is anticipated.

The Project's fuel use associated with vehicle and truck trips was calculated based on the Trip Generation Screening Memo (Appendix J), which estimates that the Project would generate 193 average daily trips. The amount of operational fuel use was estimated using CARB's EMFAC2021 model, which provided projections for typical daily fuel usage in Orange County.

Table E-2: Estimated Project Operational Energy Usage

Energy Type	Annual Energy Consumption
Electricity Consumption (kWh/year)	626,547.0
Natural Gas Consumption (therms/year)	0.0
Automotive Fuel Consumption	
Gasoline (gallons/year)	23,511.9
Diesel Fuel (gallons/year)	1,977.7

Notes: kWh = kilowatt-hours
Source: Appendix A

The Project's estimated energy usage during operations is reported in Table E-2, *Estimated Project Operational Energy Usage.* The estimated potential net increase in electricity demand associated with the operation of the Project is 626,547 kWh per year. Based on fuel consumption estimates obtained from EMFAC2021, approximately 1,230 million gallons of gasoline and approximately 156 million gallons of diesel will be consumed from vehicle trips in Orange County in 2023. Therefore, vehicle and truck trips associated with the proposed operations would increase the annual fuel use in Orange County by less than 0.01 percent for gasoline and diesel fuel usage. However, the Project would be required to adhere to all federal, state, and local requirements for energy efficiency, including the Title 24 standards, listed as PPP-1. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. Therefore, electricity consumption associated with Project operation would not be considered inefficient, wasteful, or unnecessary in comparison to other developments within the region. Therefore, potential impacts related to Project development would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

b) In 2002, the Legislature passed SB 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels for the Integrated Energy Policy Report. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC's *2021 Integrated Energy Policy Report* and *2022 Integrated Energy Policy Report Update* provide the results of the CEC's assessments of a variety of energy issues facing California. As indicated above, energy usage on the Project site during construction and operation would be relatively small in comparison to the overall use in Orange County and the state's available energy resources. Therefore, energy impacts at the regional level would be negligible. Because California's energy conservation planning actions are conducted at a regional level, the Project would not conflict with or obstruct California's energy conservation plans as described in the CEC's Integrated Energy Policy Report. Additionally, as previously described, the Project would be required to comply with the Title 24 Building Energy Efficiency Standards. The City Planning Department would review the design components and energy conservation measures during the permitting process, which would ensure that all requirements are met. As such, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant, and no mitigation is required.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

PPP E-1. Title 24 CalGreen Compliance: The Project is required to comply with the CalGreen Building Code as included in the City's Municipal Code Section 15.17.010 to ensure efficient use of energy. CalGreen specifications are required to be incorporated into building plans as a condition of building permit approval.

Sources

Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report. April 2023. Prepared by LSA. (Appendix A).

7. GEOLOGY AND SOILS. *Would the project:*		Potentially Significant Impact	Less than Significant 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:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
	ii) Strong seismic ground shaking?	☐	☐	☒	☐
	iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv) Landslides?	☐	☐	☐	☒
(b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The discussion below is based on the Preliminary Geotechnical Evaluation prepared by LGC Geotechnical, Inc. in March 2022 (included as Appendix C) and the Archaeological and Paleontological Resources Records Results prepared by BFSA Environmental Services in May 2023 (included as Appendix B).

Impact Analysis:

a) i) The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Fault Zone is the Yorba Linda Fault Zone, located approximately 8 miles northeast of the Project site. Additionally, there are no known active faults traversing the site (Appendix C). The nearest faults to the Project site include the El Modeno and Peralta Hills faults located approximately 2.3 miles northeast and 2.8 miles northeast, respectively, from the site (USGS and CGS). Thus, the Project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map, and impacts would not occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

a) ii) The Project site is located within a seismically active region of Southern California. According to the USGS Quaternary Faults Map, the nearest faults to the Project site include the El Modeno and Peralta Hills faults located approximately 2.3 miles northeast and 2.8 miles northeast, respectively, from the

site. Thus, moderate to strong ground shaking can be expected at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology.

Structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), included in the Municipal Code as Chapter 15.04. In addition, PPP GEO-1 has been included to provide CBC provisions for earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Mandatory compliance with the CBC would include the incorporation of; 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. With compliance to the CBC, the Project would result in a less than significant potential impact related to strong seismic ground shaking.

Significance Determination: Less than significant.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant.

a) iii) Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density, fine, clean sandy soils; and 3) strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.[13]

The Project site is not located within an area identified by the State of California as being potentially susceptible to liquefaction (Appendix C). The soils onsite are primarily comprised of medium dense or medium stiff to very stiff sandy silt to sandy clay, with lesser amounts of silty clay, and scattered silty sand. Additionally, groundwater was not encountered during soil borings which reached a maximum depth of 50± feet. The most recent water level readings from a monitoring well located approximately 0.9 miles west of the site indicated a high groundwater level of 75± feet below the ground surface; therefore, groundwater is not anticipated to be reached during grading. Due to the absence of low-density sandy soils and a relatively deep groundwater level, the liquefaction potential at the site is considered to be very low (Appendix C).

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

[13] Bray, J.D., & Sancio, R. B., 2006, Assessment of liquefaction susceptibility of fine-grained soils, *Journal of Geotechnical and Geoenvironmental Engineering,* ASCE, pp. 1165-1177, dated September 2006.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

As described above, the Project site is located in a seismically active region subject to strong ground shaking. However, the site is flat and does not contain any hills or any other areas that could be subject to landslides. Figure PS-1, *Environmental and Natural Hazard Policy Map*[14]*,* from the City's General Plan Public Safety Element, shows that the Project site is not within a landslide hazard area. Therefore, the Project would not cause potential substantial adverse effects related to slope instability or seismically induced landslides and no impacts would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

The Project would be required to comply with Municipal Code Title 7 Chapter 7.01 which establishes water quality and stormwater discharge standards. These include installation of best management practices (BMPs) in compliance with the Orange County MS4 Permit to minimize soil erosion. Additionally, the Construction General Permit (CGP; Order No. R8-2002-0011) issued by the State Water Resources Control Board (SWRCB) regulates construction activities to minimize water pollution, including sediment. The Project would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated BMPs during grading and construction, which would be required during construction permitting of the Project.

Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. After completion, the Project site would be developed with three self-storage buildings, a new paved parking lot, and landscape improvements, and would not contain exposed soil. Thus, the potential for soil erosion or the loss of topsoil would be expected to be extremely low. Construction of the Project would have a less than significant impact related to potential soil erosion.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

[14] Located on Page PS-9 in the Public Safety Element of the City of Orange General Plan. Available online at: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000

c) The Project site is flat and neither contains nor is adjacent to any slope or hillside area. As previously stated, the Project site is not within a landslide hazard area (City of Orange, 2010). The Project would not create slopes. Thus, neither on- or offsite landslides would occur from implementation of the Project.

Lateral spreading, a phenomenon associated with seismically induced soil liquefaction, is the horizontal displacement of soils due to a reduction in soil cohesion. It is typically exemplified by the formation of vertical cracks on the surface of liquefied soils, and usually takes place on gently sloping ground or level ground near drainages or stream channels (Appendix C). Due to the absence of low-density sandy soils and a relatively deep historically high groundwater level, the potential for lateral spreading is low (Appendix C). Also, as described previously, compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including lateral spreading. Thus, impacts related to lateral spreading would be less than significant.

Differential settlement or subsidence could occur if buildings or other improvements were built on low-strength foundation materials or if improvements were constructed on different types of subsurface materials (e.g., a boundary between native material and fill). Although differential settlement generally occurs slowly enough that its effects are not dangerous to inhabitants, it can cause building damage over time.[15] Soils susceptible to seismically induced settlement typically include dry loose sands. As previously described, the Project site does not contain such soil types; therefore, the risk of settlement or subsidence at the Project site is low (Appendix C). Thus, with compliance with the CBC, included as PPP GEO-1, and compliance with the recommendations of the Geotechnical Investigation, potential impacts related to settlement or subsidence would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

d) Expansive soils contain certain types of clay minerals that shrink or swell as moisture content changes. Shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experiences, such as Southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.[16]

Near-surface soils within the Project site consist of sandy silt to sandy clay, with lesser amounts or silty clay, and scattered silty sand. These soils possess a very low to medium expansion potential (Appendix C). Compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations for the grading plans and building specifications as a condition of construction permit approval to ensure that structures would withstand the effects of related to ground movement, including expansive soils. Engineering design recommendations would be reviewed and approved by the City's Building Official or designee prior to issuance of building permits. Thus, impacts would be less than significant.

[15] National Oceanic and Atmospheric Administration. Available online at: https://oceanservice.noaa.gov/facts/subsidence.html
[16] USDA, Understanding Soil Risks and Hazards. Available online at: https://geology.com/articles/expansive-soil.shtml

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

f) Sediments within the Project site were identified as late to middle Pleistocene-aged old alluvial fan deposits (Appendix B). The paleontological record search revealed no fossil localities within the Project site. However, remains of a Pleistocene sheep and mammoth or mastodon remains were identified approximately 2.5 miles north and 4.0 miles northeast of the Project site, respectively. Thus, the Paleontological Resources Assessment determined that the sediments have a high potential for fossils, starting at a depth of five feet below the surface.

The Geotechnical Investigation recommends over-excavation within the proposed building pad area to a depth of five feet below existing grade or two feet below the proposed footing, whichever is greater. Therefore, the applicant has agreed to incorporate Mitigation Measure PAL-1 into the Project, which requires the retention of a paleontologist as described therein, and the preparation of a paleontological resources impact mitigation program (PRIMP), which would stablish monitoring procedures and discovery protocols, based on industrywide best practices. With the incorporation of Mitigation Measure PAL-1 into the Project, impacts to paleontological resources from development of the Project would be less than significant.

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

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

Criteria for discard of specific fossil specimens will be made explicit. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

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

Sources

Preliminary Geotechnical Investigation. March 2022. Prepared by LGC Geotechnical, Inc. (Appendix C).

Archaeological and Paleontological Resources Records Results. May 2023. Prepared by BFSA Environmental Services Company. (Appendix C).

City of Orange. 2010. Orange General Plan, Public Safety Element (Figure PS-1). [online]: https://www.cityoforange.org/home/showpublisheddocument/214/637698172567530000. Accessed May 15, 2023.

USGS and CGS (U.S. Geological Survey and California Geological Survey). Quaternary Fault and Fold Database of the United States. [online]: https://www.usgs.gov/natural-hazards/earthquake-hazards/faults. Accessed May 15, 2023.

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

The discussion below is based on the Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report, prepared by LSA in April 2023 (included as Appendix A).

Impact Analysis:

a) The City's *Guidance for Greenhouse Gas Emissions Analysis Memo* states that the City accepts the Tier 3 quantitative thresholds recommended in the SCAQMD's Interim CEQA GHG Significance Threshold and has a threshold of 3,000 $MTCO_2e$ per year for commercial projects[17]. The SCAQMD formed a working group to identify greenhouse gas emissions thresholds for land use projects that could be used by local lead agencies in the Basin in 2008. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold[18], that could be applied by lead agencies, which includes the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - All land use types: 3,000 $MTCO_2e$ per year
    - Based on land use type:
        - Residential: 3,500 $MTCO_2e$ per year
        - Commercial: 1,400 $MTCO_2e$ per year
        - Mixed use: 3,000 $MTCO_2e$ per year
- Tier 4 has the following options:
    - Option 1: Reduce business as usual emissions by a certain percentage; this percentage is currently undefined.
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.

[17] City of Orange Community Development Department. Guidance for Greenhouse Gas Emissions Analysis. Available online at: https://cityoforange.prod.govaccess.org/home/showpublisheddocument/44/637707607308500000. (Accessed June 2023).
[18] South Coast Air Quality Management District. Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. (June 2023).

- Option 3, 2020 Target: For service populations (SP), including residents and employees, 4.8 $MTCO_2e$ /SP/year for projects and 6.6 $MTCO_2e$ /SP/year for plans.
- Option 3, 2035 Target: 3.0 $MTCO_2e$ /SP/year for projects and 4.1 $MTCO_2e$ /SP/year for plans.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level[19]. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

Based on the foregoing guidance, the City of Orange has elected to rely on compliance with a local air district threshold in the determination of significance of Project-related GHG emissions. Specifically, the City has selected the interim 3,000 $MTCO_2e$/yr threshold recommended by SCAQMD staff for all project types against which to compare Project-related GHG emissions[20].

The 3,000 $MTCO_2e$/yr threshold for residential/commercial uses was proposed by SCAQMD a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 $MTCO_2e$/yr threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (2008) document and subsequent Working Group meetings (latest of which occurred in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed)[21]. Further, as stated by SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80% below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2022[22].

Thus, the City has determined that, for purposes of this analysis, if Project-related GHG emissions do not exceed the 3,000 $MTCO_2e$/yr threshold, then Project-related GHG emissions would clearly have a less than significant impact.

Construction

Demolition and construction activities associated with the Project would produce combustion emissions from various sources. GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

[19] See page 3-2 of the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. (June 2023).
[20] City of Orange Community Development Department. Guidance for Greenhouse Gas Emissions Analysis. Available online at: https://cityoforange.prod.govaccess.org/home/showpublisheddocument/44/637707607308500000. (Accessed June 2023).
[21] South Coast AQMD. Greenhouse Gases. Available online at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2. (Accessed June 2023).
[22] See page 3-2 of the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold.

The SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of a project, defined by the SCAQMD as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier[23]. Using CalEEMod version 2022.1, it is estimated that the Project would generate approximately 560.0 MT CO_2e during construction of the Project. When annualized over the 30-year life of the Project, annual emissions would be 18.7 MT CO_2e, as shown in Table GHG-1. (See Addendum A for the calculation details.)

Operation

Operational or long-term GHG emissions are typically comprised of direct emissions generated from mobile sources, area sources, and stationary sources, and indirect emissions from sources associated with energy consumption, waste sources, and water sources. Mobile-source GHG emissions would include Project-generated vehicle and truck trips to and from the site. Area-source emissions would be associated with activities such as landscaping and maintenance. Energy source emissions would be generated at off-site utility providers from electricity demand generated by the Project. Waste source emissions include those generated by land filling and other methods of disposal related to transporting and managing Project-generated waste. In addition, water source emissions associated with the Project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Following guidance from the SCAQMD[24], GHG emissions were estimated for the operational year of 2024 using CalEEMod version 2022.1, and are shown in Table GHG-1, *Operational Greenhouse Gas Emissions*. The CalEEMod worksheets for the GHG emission calculations are located within Appendix A.

As discussed above, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis, the Project would result in approximately 514.5 MT CO_2e/yr. With construction emissions (amortized over 30 years), the total annual GHG emissions would be 533.2 MT CO_2e/yr, which would be less than the SCAQMD threshold of 3,000 MT CO_2e/yr. Therefore, construction and operation of the Project would generate GHG emissions that would have a less than significant effect on the environment and impacts would be less than significant.

Table GHG-1: Operational Greenhouse Gas Emissions

Emissions Source	Operational Emissions				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
Mobile Sources	225.0	<0.1	<0.1	228.0	44
Area Sources	2.7	<0.1	<0.1	2.7	<1
Energy Sources	151.0	<0.1	<0.1	152.0	30
Water Sources	60.5	1.0	<0.1	92.8	18
Waste Sources	11.2	1.1	0.0	39.0	8
Total Project Operational Emissions				**514.5**	**100**

[23] See page 3-9 of the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. (June 2023).
[24] See Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold.

Emissions Source	Operational Emissions				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
Amortized Construction Emissions				18.7	-
Total Annual Emissions				**533.2**	-
SCAQMD Threshold				3,000	-
Threshold Exceeded?				**No**	-

Notes: CH4 = methane; CO2 = carbon dioxide; CO2e = carbon dioxide equivalent; MT/yr = metric tons per year;
N2O = nitrous oxide; SCAQMD = South Coast Air Quality Management District.
Source: Appendix A

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

b)

2022 Scoping Plan
EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030, and was codified by SB 32. CARB released a second update to the Scoping 2017 Plan to reflect the 2030 GHG target. SB 32 expanded the reduction target previously set by AB 32 to move towards achieving the state's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Under AB 197, air emissions data collected by CARB are required to be made public and updated at least once a year.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality set by AB 1279 no later than 2045.[25] The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emissions as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles. Additionally, the Project promotes the use of zero-emission transportation through the proposal of 1 electrical vehicle ready stall and 6 bike parking spaces.

[25] California Air Resources Board. 2022 Scoping Plan for Achieving Carbon Neutrality. Available online at: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf. (Accessed June 2023).

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As mentioned above, the Project would not be powered by natural gas, and no natural gas demand is anticipated during construction or operation. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and will not have a cumulative considerable impact on climate change. Therefore, the Project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As previously discussed, the Project would comply with the CALGreen Code, which includes a variety of different measures, including the reduction of wastewater and water use. In addition, the Project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the Project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the Project. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Vehicles traveling to the Project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the Project would not conflict with the identified transportation and motor vehicle measures.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The core vision in the SCAG 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). Land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The 2020–2045 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2020–2045 RTP/SCS but provides incentives for consistency for governments and developers.

As identified in the Trip Generation Screening Analysis discussed in Section 17, *Transportation*, below, the Project would be located within a Transit Priority Area and a low vehicle miles traveled (VMT)

generating area. In addition, the Project buildings would implement newer building standards that would still be consistent with the same land use assumptions used to prepare the 2020–2045 RTP/SCS. As such, the Project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. As such, implementation of the Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020–2045 RTP/SCS.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

PPP E-1: CALGreen Compliance. As listed previously in Section 6, *Energy*.

Sources

Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report. April 2023. Prepared by LSA. (Appendix A).

City of Orange. March 2020. *Local Guidance Memo for Greenhouse Gas Emissions Analysis.* [online]: https://cityoforange.prod.govaccess.org/home/showpublisheddocument/44/637707607308500000. Accessed May 22, 2023.

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

The discussion below is based on the Phase I Environmental Site Assessment prepared by Geosyntec Consultants, dated August 2021 (included as Appendix E), the Phase II Environmental Site Assessment prepared by Geosyntec Consultants, dated December 2021 (included as Appendix F), and the Remedial Action Plan and TSCA Application prepared by Geosyntec Consultants, dated April 2023 (included as Appendix G).

Impact Analysis

a) A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released.[26] Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that regulatory agencies believe would be injurious to the health and safety of persons or harmful to the environment. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be operated for development of the Project. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored, handled, or transported. Other materials used—such as paints, adhesives, and solvents—could also result in accidental releases or spills that could pose risks to people and the environment. These risks are standard, however, on all construction sites, and the Project would not cause greater risks than would

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

occur on other similar construction sites. Moreover, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

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

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

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

Operation

Operation of the proposed self-storage facility would not involve the routine use of substantial amounts of hazardous materials. Instead, the proposed use would involve the routine use and storage of only small quantities of potentially hazardous materials typical of those used in commercial uses, such as cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, paints, bleach, grease, and petroleum products. In other words, the Project generally would not produce significant amounts of hazardous waste or require the use or transport of hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project site, creates a significant hazard to the environment or public.

Moreover, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's

standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

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

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

Recognized Environmental Conditions & Business Environmental Risks. In August 2021, Geosyntec Consultants completed a Phase I Environmental Assessment (Phase I ESA) of the single parcel within the Project site (Appendix E). The 2021 Phase I ESA identified a recognized environmental condition (REC), a historical recognized environmental condition (HREC), and a de minimus condition associated with the Project site:

Current Site Uses. The Project site is currently developed with two vacant industrial buildings formerly occupied by Roseburrough Tools Inc. During the site visit for the Phase I ESA, there were no RECs identified on the Project site. Metal shavings, small containers of curing concrete, and a utility owned pad-mounted transformer were discovered onsite, however none was identified as a REC.

Historic Site Uses. The Project site was originally developed for commercial uses in the 1960s and was occupied by Kerns Pacific, Keystone Precision, and Pennwalt Corporation until approximately 1994, after which it was occupied by Roseburrough Tool Inc. for the fabrication and sale of concrete, plaster, and masonry tools. Pennwalt's operation of the site included production of more than 150 products utilizing approximately 38 above ground storage tanks and mixing tanks. Pennwalt's operations included chemical specialties, inorganic chemicals, lubricants, and metal preparation.

Polychlorinated Biphenyls. A site assessment completed in 1989-1990 identified an oil/water mixture in the gravel bed and low levels of polychlorinated biphenyls (PCBs). Remediation activities included the excavation of 2,000 cubic yards of soil which were then backfilled with imported soils. PCB concentrations in one confirmation sample exceeded the site-specific cleanup goal of 25 milligrams per kilogram (mg/kg); however, the sample was considered anomalous based on re-sampling in this location. While the remedial action was issued formal regulatory closure by the local overseeing agency, the remediation did not conform to the EPA requirements for PCB remediation as set forth in the Toxic Substances Control Act (TSCA, 40 CFR 761), which requires the characterization and remediation of soils containing PCBs above 1 mg/kg. Therefore, the Phase I ESA determined that the remaining concentrations of PCBs are considered to be a REC for the Project site, and a Phase II ESA was recommended.

The Phase II testing took place over four site visits starting on August 9, 2021 (Appendix F) and consisted of soil sampling and evaluation of PCB concentrations throughout areas on the western portion of the property. Over the four mobilizations, PCB concentrations exceeding the TSCA screening threshold of 1 part per million (ppm) / 1 milligram per kilogram (mg/kg) were detected in 85 out of the 232 samples collected. Given the level of PCB contamination onsite and following consultation with EPA, the April 2023 Remedial Action Plan and TSCA Application (RAP) was prepared and submitted to EPA Region 9 to define a remedial approach for the PCB contamination at the site in accordance with TSCA and other applicable local and state regulations, as applicable (Appendix G). The remedial approach is included as Mitigation Measures HAZ-1 through HAZ-3 (Appendix F). In addition, the Project would implement a Health & Safety Plan during Project construction, as outlined in Mitigation Measure HAZ-4. With the incorporation of Mitigation Measures HAZ-1 through HAZ-4 into the Project, potential impacts related to PCB contamination onsite would be less than significant.

Total Petroleum Hydrocarbons/Soil Vapor. The final post-excavation soil samples collected following historical excavation and remediation activities contained total petroleum hydrocarbons (TPH) up to 3,200 mg/kg, which were below current non-cancer commercial/industrial thresholds for longer-chain TPH but were marginally above current applicable non-cancer commercial/industrial thresholds for shorter-chain aromatic TPH. Based on the site history and the historical investigations already done on the Project site, the potential for significant soil vapor VOC impacts at the Project site is considered to be minimal, and significant concentrations of VOCs have not been detected in the site soils. TPH detections in site soils collected to date have generally consisted of longer-chain hydrocarbons (TPH-d to TPH-o), which are below levels that would be considered a risk to commercial uses and lack any presence of lighter gasoline-range hydrocarbons (TPH-g). However, excavated soils would be analyzed for VOCs per USEPA Method 8260B as part of the waste characterization process, and if VOC concentrations are identified above applicable state screening levels, additional actions would occur pursuant to the Soil Management Plan (SMP) being prepared for the Project, as outlined in Mitigation Measure HAZ-3. Further, excavation and earthwork activities in the areas with identified PCB/TPH impact to soils would be conducted in accordance with SCAQMD Rules 1166 and 1466 in order to mitigate potential risk to workers, the community, and the environment during excavation and earthwork activities associated with the potential presence of VOCs within the disturbed soils.

Therefore, with implementation of Mitigation Measures HAZ-1 through HAZ-4, the Project would result in less than significant impacts related to a reasonably foreseeable upset and accident condition involving the release of hazardous materials into the environment during construction and related to bringing development and people to a site containing hazardous materials. The remedial strategy outlined in

Mitigation Measures HAZ-1 through HAZ-4 would substantially reduce the amount of soil contamination present at the Project site to levels that are protective of human health and to the environment in the long term, while also significantly reducing the shorter-term risk to the community that could potentially occur via excessive excavation and off-site transportation of contaminated soils. Thus, this remedial strategy is anticipated to provide an optimal balance of onsite consolidation and offsite disposal for maximum community benefit. Impacts would be less than significant with mitigation incorporated.

In addition to compliance with HAZ-1 through HAZ-4, the Project Applicant would work with the City to comply with all applicable EPA standards and processes including managing remediation waste from PCB cleanups through performance based disposal, completing EPA Form 7710-53 prior to starting onsite work, and if encountering PCBs over 50 mg/kg is expected, the Project would work directly with the EPA for cleanup. Therefore, after incorporation of HAZ-1 through HAZ-4, impacts would be less than significant with mitigation.

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

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

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

Significance Determination: Less than significant with mitigation incorporated.
Mitigation Measures:

HAZ-1 Remedial Action Plan: During and after demolition of the existing onsite buildings, a remedial action plan shall be executed via targeted excavation of areas in which PCBs have been identified above 15 mg/kg shall be conducted via a phased approach. The anticipated excavation phasing, targeted toward minimizing potential exposure of workers and the public at any given time would include the following:

Phase I: Phase I shall include clearing and grubbing of any scrub or vegetation; demolishing of all site structures and surface protrusions, leaving only building foundations and pavement.

Phase IIa: Phase IIa shall include the removal of sections of the concrete foundation in approximately 25 feet by 25 feet square sections centered on each sampled location in which PCBs were previously identified above 15 mg/kg. Following removal of each individual section of foundation, soils shall be removed to the depths in which previous sampling indicated PCBs were present above 15 mg/kg, with each excavation anticipated to extend out approximately 10 feet (3 meters) from each historical sampling location, forming initial excavation cells of 20 feet by 20 feet (6 meters by 6 meters). The extent of each initial excavation cell may be modified based on field observations, such as chemical odors or visual staining.

Following excavation, confirmation sampling shall be conducted in conformance with an associated Remedial Design and Implementation Plan (RPDIP). In the event that confirmation sidewall samples indicate that PCB concentrations above 15 mg/kg are present beyond the proposed excavation extent, the excavation wall shall be extended by 2 feet and resampled. If bottom floor samples indicate the extent of PCB concentrations above 15 mg/kg are present below the depth of the excavation, the excavation shall be extended downward one foot and resampled. This process shall be continued until the concentrations of total PCBs in confirmation soil samples are below 15 mg/kg based on a 95% Upper Confidence Limit (UCL) evaluation, in accordance with United States Environmental Protection Agency (USEPA) protocols. Excavated soils shall be stockpiled and segregated based upon their relative degree of contamination, and in such a manner that minimizes the potential for fugitive dust, VOC emissions, and stormwater runoff/run-on to be produced. All excavation and soil handling will be conducted in accordance with South Coast Air Quality Management District (SCAQMD) Rules 1166 and 1466.

Phase IIb: Following completion of delineation and excavation activities beneath the existing western building, excavation shall proceed in the outdoor areas beneath the asphalt and other paved areas, in the same manner as completed in Phase IIa. Excavated soils shall be stockpiled and segregated based upon location and relative degree of contamination.

Phase III: Soils shall be stockpiled based on the anticipated degree of relative contamination. Soils in the immediate vicinity of historical sample locations in which samples contained greater than 50 mg/kg, as well as soils exhibiting significant visual staining or olfactory indications of contamination, shall be stockpiled separately from other soils. Excavated soil stockpiles shall be characterized via composite soil sampling at the appropriate sampling frequency for the relative size of each stockpile, with soils containing total PCBs at concentrations greater than 15 mg/kg disposed offsite in accordance with the disposal criteria of the accepting facility.

Phase IV: Upon receipt of satisfactory sample results (i.e., PCBs <15 mg/kg at 95% UCL and other constituents below applicable screening levels), each grid shall be backfilled with clean soils from an offsite borrow source and appropriately compacted.

Phase V: An engineered cap consisting of at least 6 inches of concrete will be designed and constructed to cover remaining subsurface soils with concentrations of PCBs above 1 ppm in accordance with 40 CFR §761.61(a)(7).

HAZ-2 Maintenance Plan: Following completion of the construction activities, a maintenance plan shall be prepared and submitted to USEPA for review and approval. The maintenance plan shall include an ongoing operation, maintenance, and monitoring (OM&M Plan) to ensure the cap is properly maintained. The concrete surface of the cap shall be visually inspected at six-month intervals during the first year and then annually thereafter. Observations shall be documented and photographs shall be taken. If the cap is compromised (cracks, holes, or signs of deterioration), the cap shall be repaired pursuant to the measures set forth in Mitigation Measure HAZ-1, as necessary.

The inspection observations, photographs, and repairs shall be incorporated into a summary report submitted to USEPA annually. Five-Year Reviews shall be conducted every five years to ensure that the response action and remedial action objectives (RAOs) are being upheld and that the remedy remains protective.

HAZ-3 Remedial Design and Implementation Plan: Prior to issuance of a demolition permit, the Project applicant shall demonstrate to the City of Orange that a qualified environmental consultant has been retained and has prepared a Remedial Design and Implementation Plan (RDIP) that details procedures and protocols for onsite management and offsite disposal of soils containing PCBs and TPH. The RDIP shall be implemented during grading activities onsite to ensure that soils containing PCBs and TPH are properly identified, monitored, managed onsite, and disposed of if necessary, and include the following:

- A certified hazardous waste hauler shall remove all soils identified with PCB concentrations exceeding 15 mg/kg. In addition, sampling of soil shall be conducted during excavation to verify that soils identified to contain PCBs at concentrations greater than 15 mg/kg are removed. Excavated materials with PCBs exceeding 15 mg/kg shall be transported per California Hazardous Waste Regulations to a landfill permitted by the State to accept the waste stream.
- Any subsurface materials exposed during construction activities that appear suspect of contamination, either from visual staining or suspect odors, shall be assumed hazardous and handled/segregated accordingly. Excavated soils shall be tested for potential hazardous properties. If other contamination (i.e., non-PCB) is found to be present above current Department of Toxic Substances Control Screening (DTSC) Levels for industrial/commercial land use (DTSC-SLi) (or else EPA Regional Screening Levels for industrial/commercial land use [EPA-RSLi] where DTSC has not established California-specific screening levels), it shall be handled, transported, and disposed in accordance with state regulations to an appropriately permitted landfill.
- The RDIP shall include a Health and Safety Plan (HSP) addresses potential safety and health hazards and includes the requirements and procedures for employee protection; each contractor will be required to have their own HSP tailored to their particular trade that addresses the general project safety requirements. The HSP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.
- The RDIP shall include an Air Quality Management Plan (AQMP) prepared in accordance with SCAQMD Rules 1166 and 1466. Rule 1166 outlines permitting, emissions, and monitoring requirements for handling soils that are potentially impacted with VOCs or petroleum compounds during earth-moving activities. Rule 1466 applies to any owner or operator conducting earth-moving activities with soil potentially containing toxic air contaminants (TACs) as defined within the Rule. The AQMP shall outline requirements for real-time VOC and dust monitoring throughout all earth-moving activities in accordance with Rules 1166 and 1466,

respectively and shall require the timely testing and sampling of soils so that excavated soils can be separated based on respective hazardous properties. The RDIP shall specify the testing parameters and sampling frequency. Anticipated testing includes PCBs and TPH for in-place confirmation sampling, and in addition, is anticipated to include VOCs and Title 22 Metals for stockpiled soils pending disposal. During excavation, all soils within the areas in which PCBs have previously been detected will be strictly managed to mitigate potential fugitive dust and VOC emissions in accordance with Rules 1166 and 1466. Under Rules 1166 and 1466, and other applicable local, state, and federal guidelines, soils shall be transported from the project site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. Soil transport routes will also be pre-established to minimize potential impact to the community, with transportation routes approved by the EPA prior to initiation of earthworking activities.

- All RDIP measures shall be printed on the construction documents, contracts, and Project plans prior to issuance of grading permits.

HAZ-4 Health & Safety Plan: Due to the presence of soils contaminated with PCBs onsite, a HASP shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719). The HASP shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public due to the remedial actions associated with the PCB contaminated soils during Project construction and shall include any applicable health and safety recommendations contained in the Remedial Action Plan and associated documents. The HASP shall have emergency contact numbers, maps to the nearest hospital, allowable worker exposure limits, and mandatory personal protective equipment requirements. The HSP shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.

Significance Determination After Mitigation: Less than significant impact.

c) There are no schools located within one-quarter mile of the Project site. The closest schools to the Project site are Sycamore Elementary School, located at 340 North Main Street, approximately 0.36-mile southwest of the Project site and Richland High School, located at 615 North Lemon St, approximately 0.41-mile east of the Project site. However, the Project would comply with all relevant and applicable federal, state, and local laws and regulations that pertain to the release of hazardous materials.

Construction

As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of commercial developments and would include vehicle fuels, paints, oils, and transmission fluids. Furthermore, all such materials used would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state Occupational Safety and Health Act requirements, and would not create a significant hazard to nearby schools. The use of hazardous materials would also be regulated by the Orange County Environmental Health Division. Additionally, construction-related emissions would be regulated by SCAQMD Rules 401 and 403. Further, construction truck trips would utilize City-approved truck routes, which would route construction vehicles away from sensitive receptors as trucks would travel north on Batavia Street,

west on Collins Avenue, south on Eckhoff Street, and west on Orangewood Avenue to SR-57. Therefore, the Project's potential construction-related impacts within a one-quarter mile of an existing school caused by hazardous emissions and materials would be less than significant.

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

Significance Determination: Less than significant.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

e) The Project site not located within an airport land use plan (ALUC, 2008). Additionally, the Project site is not located within two miles of a public airport. The nearest airports are the John Wayne Airport, located approximately 7.8 miles south of the Project site, within the City of Santa Ana, and the Fullerton Municipal Airport, located approximately 8.4 miles northwest of the Project site in the City of Fullerton. Therefore, the Project would not result in an airport-related safety hazard for people working in the Project area and impacts would not occur from implementation of the Project.

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Construction
During construction, haul truck trips would transport construction debris and materials to and from the Project site; however, these trips would not impact the roadway in a way that would impede emergency evacuations. The installation of driveways and connections to existing infrastructure systems that would be implemented during construction of the Project could require the temporary closure of portions of the roadway; however, construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. Additionally, the Project is not directly adjacent to roadways that have been designated by the City as evacuation routes[27]. Implementation of the Project through the City's permitting process would ensure compliance with existing regulations and would reduce potential construction related emergency access impacts to a less than significant level. Therefore, impacts related to an emergency response or evacuation plan during construction would be less than significant.

Operation
Operation of the proposed self-storage facility would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project site would be accessed by two driveways on Batavia Street. (See Figure 7, *Conceptual Site Plan*.) In addition, the Project site would include a 20 to 26-foot-wide fire lane encompassing the site. The Project site driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

g) The Project site is not located in an area designated as a Fire Hazard Severity Zone (CAL FIRE, 2023). In addition, the Project site is located in an urban infill area, is fully developed and is surrounded by developed areas. Implementation of the Project would be required to adhere to the California Fire Code, as adopted by the City, and would be reviewed by the City's Building and Safety Services Division during the permitting process to ensure that the Project meets the fire protection requirements. As a result, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

[27] Orange Fire Department. Available online at: https://cityoforange.maps.arcgis.com/apps/webappviewer/index.html?id=fa359340bb5d4689a6a93bd5d6d8d334

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

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

Sources

ALUC (Airport Land Use Commission). Amended 2008. Land Use Plan for John Wayne Airport (Figure 1). [online]: https://files.ocair.com/media/2021-02/JWA_AELUP-April-17-2008.pdf?VersionId=cB0byJjdad9OuY5im7Oaj5aWaT1FS.vD. Accessed May 18, 2023.

CAL FIRE (California Department of Forestry and Fire Protection). 2023. Fire Hazard Severity Zone Viewer [online]: https://egis.fire.ca.gov/FHSZ/. Accessed May 17, 2023.

Orange Fire Department. Evacuation Information. [online]: https://orangecityfire.org/evacuation-info. Accessed May 17, 2023.

Phase I Environmental Site Assessment Report. August 2021. Prepared by Geosyntec Consultants (Appendix E).

Phase II Environmental Site Assessment Report. December 2021. Prepared by Geosyntec Consultants (Appendix F).

Remedial Action Plan and TSCA Application. April 2023. Prepared by Geosyntec Consultants (Appendix G).

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

The discussion below is based on the Drainage Study prepared by Omega Engineering Consultants in March 2022 (included as Appendix H) and the Preliminary Priority Water Quality Management Plan (PWQMP) prepared by Omega Engineering Consultants in June 2023 (included as Appendix I).

Impact Analysis

a) The Santa Ana Regional Water Quality Control Board (RWQCB) would have jurisdiction over the groundwater quality and surface water discharges for the proposed Project.

Construction

Construction activities include demolition, site preparation, grading, paving, and installation of new landscaping that would expose and loosen sediment and would have the potential to degrade surface and receiving water quality via stormwater runoff. In addition, construction vehicles and equipment are prone

to tracking soil from work areas to paved roadways, which could exacerbate sedimentation of receiving waters. Pollutants of concern during construction activity generally include sediment, trash, petroleum products, concrete water, sanitary waste, and chemicals.

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

- silt fences;
- sediment/desilting basins;
- sediment traps;
- check dams;
- fiber rolls;
- gravel bag berms;
- sandbag barriers;
- straw bale barriers;
- street sweeping and vacuuming; and
- storm drain inlet protection.

Other BMPs that could be used to enhance erosion and sediment control include scheduling to avoid wet weather events, preserving existing vegetation, and placing cover material over exposed soil. BMPs would also include practices for proper handling of chemicals such as avoidance of fueling at the construction site and overtopping during fueling, and installation of containment pans. Implementation of BMPs in compliance with the City's permitting requirements would reduce potential erosion and sedimentation impacts to below a level of significance during construction.

Operation

The existing site is currently developed with two industrial buildings and asphalt hardscape. The site is covered in 94% impervious surfaces. Implementation of the proposed Project would reduce the impervious surface area to 92% of the Project site. Therefore, operation of the Project would slightly reduce the potential for pollutants such as trash and debris, and oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality.

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

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

Water supply estimates are characterized in part by land use projections. The Project is consistent with the existing Light Industrial land use designation. Thus, the Project's water usage has been accounted for within the UWMP projections. Additionally, the amount of groundwater pumped is limited by the OCWD and the Project would not directly pump water from the Project area, as water supplies would be provided by OCWD.

Infiltration of the Project site would not substantially change; pre-development conditions contain approximately 94-percent impervious area while post-development conditions would contain approximately 92-percent impervious area (Appendix H). As a result, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge; and the Project would not impede sustainable groundwater management of the basin. Thus, the Project would have a less than significant impact.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

Operation
During Project operation, the Project site's pervious areas would be landscaped with groundcover that would inhibit erosion, leaving no substantial areas of bare or disturbed soil on-site subject to erosion. In addition, as discussed above under 10(a), the Project would be required to implement a FWQMP that would identify operational BMPs to ensure that operation of the self-storage facility would not result in erosion or siltation. With implementation of these regulations, the Project's potential operational impacts related to erosion or siltation onsite or off-site would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

c) ii) The Project site does not include, and is not adjacent to, a natural stream or river. According to the Federal Emergency Management Agency (FEMA) Map 06059C0161J, the Project site is located within Flood Zone X, which indicates an area with minimal flood hazard. As described previously, buildout of the Project would not substantially alter the existing drainage pattern onsite, as the percentage of impervious surface would slightly decrease. In addition, the proposed pervious areas of the Project site would include groundcover to slow surface runoff. Table WQ-1, *Comparison of Peak Runoff Rates with Project Implementation*, below, shows that there would be a slight decrease in peak runoff with the Project as compared to the existing condition. Therefore, potential impacts related to flooding as a result of surface runoff increase would be less than significant.

Table WQ-1: Comparison of Peak Runoff Rates with Project Implementation

	24-Hour Peak Runoff (cfs)
2-Year Storm Event	
Pre-Development	**4.14**
Post-Development	**4.01**
Percent Change	**-3.14%**
100-Year Storm Event	
Pre-Development	**11.42**
Post-Development	**11.09**
Percent Change	**-2.89%**

Source: Appendix H and I

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

c) iii) As described previously, the Project site would not substantially alter existing site conditions. The Project proposes to install an onsite Bio Clean modular wetland system for surface runoff treatment and an underground pipe storage system with a volume of 7,521 cubic feet for detention (Appendix I). Surface runoff would then drain into curb inlets before being discharged into the public drainage system. The proposed drainage plan meets guidelines for a 100-year, 24-hour storm event, as set by the County of Orange (Appendix H). As such, the Project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

c) iv) The Project site is located within Flood Zone X, indicating it is in an area of minimal flood hazard (FEMA, 2020). The Project would be required to comply with the applicable flood damage prevention construction standards under Municipal Code Section 15.60.160. The City would review the Project permit applications to ensure the proposed development would not be subject to significant flood hazard and that structures would be floodproofed. Thus, the Project would not impede or redirect flood flows, and potential impacts would be less than significant.

Significance Determination: Less than significant impact.

Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

d) The Project site is located within Flood Zone X, which is an area of minimal flooding (FEMA, 2020). Thus, the Project site is not located within a flood hazard area that could be inundated with flood flows and result in release of pollutants. Impacts related to flood hazards and pollutants would not occur as a result of the Project.

Tsunamis are tidal waves generally caused by shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands[28]. The Project site is located approximately 13 miles from the ocean shoreline. Based on the distance between the Project site and the Pacific Ocean, the Project is not at risk of inundation from tsunami. Therefore, the Project would not pose a risk of release of pollutants from inundation from a tsunami. No impacts would occur.

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves within a closed body of water.[29] Seiches may cause retention structures to fail and flood downstream properties. The Project site is located approximately 1.64 miles southeast of the Burris Basin, which is a 125 acre recharge basin for the Santa Ana River[30]. However, the likely spillway path is the Santa Ana River channel, which abuts the eastern side of the Burris Basin, away from the Project site. Therefore, the Project would not pose a risk of release of pollutants from inundation from seiche. No impact would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

e) As described previously, pre- and post-construction conditions of the Project site are similar in of the amount of impervious area, and with Project resulting in a slight decrease in impervious area. Therefore, the Project would not interfere with groundwater recharge and impacts related to groundwater recharge would not occur. As discussed further in Section 19, *Utilities and Service Systems*, the Project's water demand has been accounted for in the City of Orange 2020 UWMP, since the Project is consistent with the Project site's existing land use designation. The 2020 UWMP determined that water supply and demands will be met, and the City would monitor groundwater withdrawals so as to not overdraft supplies. Therefore, the Project would not conflict with the OCWD groundwater management plan.

During construction and operation, the Project would be required to comply with regulations under the City's LIP. Compliance with the LIP would be ensured through the City's permitting process, as well as through post-construction BMP inspections and verifications. Therefore, impacts related to water quality control plans would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

[28] USGS. Available online at: https://www.usgs.gov/faqs/what-are-tsunamis
[29] National Ocean Service. Available online at: https://oceanservice.noaa.gov/facts/seiche.html
[30] Santa Ana River Trail. Available online at: http://www.santa-ana-river-trail.com/trail/burris_basin.asp

f) As described in the previous responses, construction of the Project would require asphalt removal and excavation activities that could temporarily impact stormwater runoff during construction activities. However, pursuant to Municipal Code Title 7 Chapter 7.01, implementation of a SWPPP implementing erosion and sediment control BMPs described previously would address site specific pollutant and drainage issues related to construction of the Project. Thus, construction activity impacts related to stormwater runoff would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

g) As described previously, the Drainage Study prepared for the Project site determined that post-construction conditions onsite closely mimic pre-construction conditions (Appendix H). The Project would include catch basins throughout the Project site and stormwater would be conveyed to a storage system consisting of two 48-inch high-density polyethylene pipes located under the drive aisles. In addition, as discussed above, the Project is required to implement a FWQMP that identifies operational BMPs to ensure that operation of the self-storage facility would not result in a substantial amount of increased runoff. The Project site would have a required design capture volume of approximately 7,700 cubic feet, and the Project proposes to construct an underground detention system with this capacity. Therefore, the built Project would not result in increased stormwater runoff and impacts would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

h) As discussed above in Section 9, *Hazards and Hazardous Materials*, operation of the proposed self-storage facility would require transport, storage, use, and disposal of a limited amount of hazardous materials. Due to the nature of the Project, vehicle and equipment fueling and maintenance, waste handling, and loading dock activities would not take place on the site. However, in the event that any regulated substance used onsite exceeds a specified quantity, the business would be required to comply with state and federal regulations regarding the storage, handling, and cleaning of hazardous materials as described in Section 9, *Hazards and Hazardous Materials*. Therefore, impacts would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

i) As discussed above, the Project would route stormwater runoff into a modular wetland system for treatment before stormwater is discharged into the public system (Appendix I). Furthermore, the downstream receiving waters are not 303(d) listed for any pollutants in this section of the watershed. The Preliminary Priority Water Quality Management Plan describes the implementation of stormwater BMPs including the use of the proposed modular wetland systems to help the site meet storm water quality treatment requirements in accordance with the MS4 Permit. Therefore, the Project would not result in a discharge of stormwater that would adversely affect the beneficial uses of the receiving waters. Impacts would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

j) As described previously, the proposed drainage system was determined to be able to accommodate a 100-year, 24-hour storm event, as required per Orange County guidelines. Additionally, a comparison of pre- and post-construction hydraulics, as shown in Table WQ-1, demonstrates that peak flow after Project construction would slightly decrease as compared to existing conditions. Therefore, impacts related to volume of stormwater would be less than significant.

Significance Determination: Less than significant.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant.

k) As previously discussed, construction and demolition activities would disturb and expose soil, which could be moved by wind and water, resulting in erosion and sedimentation of stormwater runoff. However, the Project site does not include any slopes, which reduces erosion potential. A majority of soil disturbance would be related to excavation and backfill. The implementation of construction BMPs, as required by the LIP and SWPPP, would serve to ensure that Project impacts related to erosion of the Project site or surrounding areas would be less than significant.

In addition, in the poste-construction condition the Project would install landscaping that would reduce the potential for erosion during operations. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that the site-specific design limits the potential for erosion on the Project site. Overall, with installation of the proposed drainage system and adherence to the existing regulations, the Project's potential impacts related to erosion would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

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

PPP WQ-2: FWQMP. Prior to the approval of the Grading Plan and issuance of Building and Grading Permits a FINAL Priority Water Quality Management Plan (FWQMP) shall be submitted to and approved by the City. The FWQMP shall identify all Post-Construction, Site Design. Source Control,

Low Impact Development, and any Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize any potential adverse effects on receiving waters.

Sources

City of Orange. November 2021. 2020 Urban Water Management Plan. [online]: https://www.cityoforange.org/home/showpublisheddocument/1540/637873464981170000 Accessed May 16, 2023.

FEMA (Federal Emergency Management Agency). 2020. Flood Insurance Rate Map (FIRM) Map No. 06059C0161J.[online]: https://hazardsfema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed May 16, 2023.

Drainage Study. March 2022. Prepared Omega Engineering Consultants. (Appendix H).

Priority Water Quality Management Plan (PWQMP). Prepared June 2023. Prepared Omega Engineering Consultants. (Appendix I).

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

Impact Analysis:

a) The Project site is a fully developed urban infill site that currently contains two light manufacturing buildings and a covered storage area. The Project site is located in a highly developed area and is surrounded on all sides by streets, a railway, and industrial development. In addition, the Project would not change any roadways or install any infrastructure that would result in physical division of a community. Thus, no impacts related to physical division of an established community would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Municipal Code. The Project site has an existing zoning designation of Industrial Manufacturing (M-2), which is intended for the development of heavy manufacturing industries. As per Section 17.13.030 of the Municipal Code, self-storage facilities are a permitted use within the M-2 zone. As previously shown in Table AES-1, the Project would comply with the development standards per City of Orange Municipal Code Chapter 17.20, *Industrial Districts*. Therefore, no impact related to Municipal Code inconsistency would occur.

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

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

Table LU-1: City of Orange General Plan Consistency

Policy	Consistency
Policy LU-1.4: Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development.	**Consistent.** As shown in Table AES-1, the Project complies with development standards within the M-2 zoning

	designation. Further, the Project would be compatible with surrounding light industrial uses.
Policy LU-3.4: Discourage commercial and industrial enterprises that have significant adverse soil, air, water, or noise impacts.	**Consistent.** As evaluated throughout this IS/MND, the Project would not result in significant impacts under the thresholds analyzed.
GOAL LU-4.0: Encourage high quality, sustainable, industrial and office uses that provide jobs and revenue; support environmental quality; and promote options for adaptive re-use.	**Consistent.** The Project proposes the demolition of the existing manufacturing buildings totaling 47,932 SF for the development of three self-storage buildings totaling 133,372 SF, which would provide revenue to the city. The Project would comply with all environmental-related regulations, as discussed in each environmental topic section of this document.
Policy LU-4.1: Maximize use of limited land resources for industrial and office uses within areas designated Light Industrial or Industrial on the Land Use Policy Map.	**Consistent.** The Project proposes to construct a self-storage facility, which is consistent with the intended uses of the Light Industrial (LI) land designation and Industrial Manufacturing (M-2) zoning designation. The LI land use designation allows a maximum floor area ratio (FAR) of 1.0, and the Project would be built out to a FAR of 1.0.
Policy LU-4.3: Protect residents and the environment from potential adverse soil, air, water, and noise impacts of industrial operations.	**Consistent.** The Project would result in less than significant impacts related to air, water, and noise as identified in each environmental topic of this document. Impacts related to soil would be less than significant with the incorporation of Mitigation Measure HAZ-1 through HAZ-4, which require the preparation and implementation of a Remedial Action Plan, Maintenance Plan, Soil Management Plan, and Health & Safety Plan, as detailed in Section 9, *Hazards and Hazardous Materials.*
Policy LU-4.4: Encourage development of mixed office, industrial, and support commercial uses in areas designated Light Industrial on the Land Use Policy Map.	**Consistent.** The Project would construct a mixed self-storage/office facility, which is consistent with intended uses within the Light Industrial land use.
Policy LU-6.1: Ensure that new development is compatible with the style and design of established structures and the surrounding environment.	**Consistent.** The Project would construct a self-storage facility surrounded by similar light industrial and commercial use buildings. As shown in Table AES-1, the Project would be consistent with the development standards for the M-2 zoning designation.
Policy LU-6.5: Reduce pollutant runoff from new development and urban runoff to the maximum extent practicable.	**Consistent.** As discussed in Section 10, *Hydrology and Water Quality*, the Project would be required to incorporate water quality measures with LID site design during Project operations and treatment control BMPs during all construction and grading activities to reduce runoff.
Policy LU-6.6: Enhance the walkability of both new and current development.	**Consistent.** The Project would install a bike rack onsite.
Policy LU-6.8: Maximize landscaping along streetscapes and within development projects to enhance public health and environmental benefits.	**Consistent.** The Project would provide landscaping along the northern and eastern property lines. The design specifications would be required to comply with the Landscaping Ordinance (City of Orange Municipal Code Chapter 16.50).
Policy LU-6.9: Restrict development in areas where exposure to hazards such as flood, erosion, liquefaction, dam failure, hazardous materials, and toxic gases cannot be mitigated to reduce risk to residents and liability to the City.	**Not applicable.** The Project site is not within a flood or inundation zone. Additionally, as discussed in Section 7, *Geology and Soils*, the Project site is not susceptible to liquefaction.
Policy LU-6.10: Mitigate adverse air, noise, circulation, and other environmental impacts caused by new development adjacent to existing neighborhoods through use of sound walls, landscaping buffers, speed limits, and other traffic control measures.	**Consistent.** The Project is not located adjacent to any residential neighborhoods. In addition, the Project would result in less than significant impacts related to air quality, noise and circulation as identified in each environmental topic section of this document.

Policy CM-1.7: Consolidate driveways along roadways that provide access to commercial uses to minimize side street interruption and promote smooth traffic flows.	**Consistent.** The Project site is accessible via two driveways along Batavia Street, classified as a primary arterial street.
Policy CM-5.2: Plan for and design parking facilities throughout the City that are adequate to meet demand, but also consider land use-parking efficiencies, and the surrounding natural and built environment.	**Consistent.** The Project would be required to provide 44 stalls. The Project proposes to provide a total of 51 parking stalls.
GOAL GM-1.0: Reduce traffic congestion within the City.	**Consistent.** As discussed in Section 17, *Transportation*, the Project would generate fewer daily trips than the existing site use.
Policy GM-1.2: Ensure completion of transportation improvements as agreed upon by the City and developer prior to completion of a development project.	**Not applicable.** The Project does not propose or require any transportation improvements. As discussed in Section 17, *Transportation*, the Project would generate fewer daily trips than the existing site use.
Policy GM-1.3: Ensure that new development pays its fair share of street improvement costs, including regional traffic mitigation. New revenues generated from Measure M, if available, shall not be used to replace private developer funding which has been omitted for any project.	**Consistent.** The Project applicant would be required to pay applicable fees in accordance with City regulations.
Policy GM-1.5: Require new development projects to link issuance of building permits for the appropriate portion of the development plan to roadway improvements required to achieve the appropriate LOS. Monitor the implementation of this requirement for each new development project on an annual basis.	**Not applicable.** As discussed in Section 17, *Transportation*, the Project would generate fewer daily trips than the existing site use. Therefore, the Project would not require a LOS analysis.
Policy GM-1.7: Promote the expansion and development of alternative methods of transportation.	**Consistent.** The Project would install a bike rack and provide one electric vehicle parking space, which would encourage alternative methods of transportation.
Policy GM-1.9: Ensure that new developments incorporate non-motorized and alternative transit amenities such as bike racks, bus benches and shelters, and pedestrian connections.	
Policy GM-1.12: Promote traffic reduction strategies through the measures adopted within the City's Transportation Demand Management (TDM) Ordinance.	**Not applicable.** The Project would not require 100 employees and thus would not be subject to the TDM Ordinance.
GOAL NR-2.0: Protect air, water, and energy resources from pollution and overuse.	**Consistent.** The Project would result in less than significant impacts related to air, water, and energy as identified in each environmental topic section of this document.
Policy NR-2.1: Cooperate with the South Coast Air Quality Management District (SCAQMD) and other regional agencies to implement and enforce regional air quality management plans.	**Consistent.** The Project is consistent with the General Plan land use designation and maximum allowed FAR. In addition, as described in Section 3, *Air Quality,* Project impacts related to emissions would be less than significant. Therefore, the Project is within the AQMP projections for the area.
Policy NR-2.2: Support alternative transportation modes, alternative technologies, and bicycle- and pedestrian-friendly neighborhoods to reduce emissions related to vehicular travel.	**Consistent.** The Project would install a bike rack onsite and provide one electric vehicle parking space, which would encourage alternative methods of transportation. In addition, as discussed in Section 3, *Air Quality,* emissions of criteria pollutants during construction and operation would be below SCAQMD thresholds. As discussed in Section 8, *Greenhouse Gas Emissions*, emissions of GHGs would be below SCAQMD thresholds and would be less than significant.
Policy NR-2.3: Reduce the amount of water used for landscaping through the use of native and drought-tolerant plants, proper soil preparation, and efficient irrigation systems as parks and other City facilities are built or renovated.	**Consistent.** The Project would use drought-tolerant plants as listed in Figure 9, *Landscape Plan.* Development of the landscape and irrigation plan would be required to comply with regulations and standards under Orange County's Water Efficient Landscape Ordinance.

Policy NR-2.4: Encourage the production, distribution, and use of recycled and reclaimed water for landscaping projects, while maintaining urban runoff water quality objectives.	**Not applicable.** No existing recycled water laterals exist within the Project vicinity. However, as discussed below, use of construction and operational BMPs would minimize stormwater pollutants, maintaining urban runoff quality.
Policy NR-2.5: Continue to work toward local and regional waste-reduction and diversion/ recycling goals and promote public education programs.	**Consistent.** The Project would be required to recycle 65 percent of construction waste and 75 percent of operational waste pursuant to the CalGreen Building Code and AB 341, respectively.
Policy NR-2.6: Encourage sustainable building and site designs for new construction and renovation projects.	**Consistent.** The Project would be required to comply with the 2022 Building Energy Efficiency Standards pursuant to Title 24.
Policy NR-2.11: Protect the ecological integrity and overall health of Orange's watersheds.	**Consistent.** As required under the MS4 Permit, the Project would be required to implement BMPs through a SWPPP and WQMP. Therefore, the Project would not adversely impact stormwater flowing into the local watersheds and groundwater.
Policy NR-2.12: Cooperate with water supply agencies to protect the quantity and quality of local groundwater supplies.	**Consistent.** Use of construction and operational BMPs would maintain stormwater quality, which may infiltrate into the local groundwater. In addition, the Project would be consistent with the existing land use and therefore consistent with projected water demands in the City's UWMP.
Policy NR-2.13: Control surface runoff water discharges into the stormwater conveyance system to comply with the City's National Pollutant Discharge Elimination System (NPDES) Municipal Permit and other regional permits issued by the Santa Ana Regional Water Quality Control Board.	**Consistent.** As discussed in Section 10, *Hydrology and Water Quality,* the Project would be required to incorporate water quality measures with LID site design and treatment control BMPs during all construction and grading activities to reduce runoff. The Project proposes to treat runoff onsite through a modular wetland system before stormwater is discharged into the public system.
Policy NR-2.14: Reduce pollutant runoff from new development by requiring use of the most low development impact practices and effective Best Management Practices (BMPs) currently available.	
Policy NR-2.15: Minimize the amount of impervious surfaces and associated urban runoff pollutants in new development and significant redevelopment throughout the community.	**Consistent.** The Project would reduce the amount of impervious surface onsite from 94 percent to 92 percent. As discussed above, the Project would also include design features and BMPs to reduce runoff pollutants.
GOAL NR-3.0: Prepare for and adapt to the effects of climate change and promote practices that decrease the City's contribution to climate change.	**Consistent.** The Project would be required to be developed per Title 24 requirements, which would implement energy efficient building standards. In addition, the Project would not result in significant GHG emissions.
Policy NR-4.3: Reduce the impact of urban development on important ecological and biological resources.	**Consistent.** The existing Project site is fully developed with two light manufacturing buildings on a paved lot. Therefore, buildout of the Project would not adversely impact any ecological or biological resources.
GOAL PS-1.0: Protect residents and businesses from seismic hazards and other geologic constraints.	**Consistent.** The Project would comply with all applicable CBC regulations, minimizing potential building damage and risk to human life from seismic hazards.
Policy PS-1.1: Minimize the potential loss of life and damage to structures that may result from an earthquake.	
Policy PS-2.4: Employ strategies and design features that will reduce the amount of impervious surface (i.e. paved area) within new development projects.	**Consistent.** The Project would reduce the amount of impervious surface from 94 percent to 92 percent.
Policy PS-3.4: Provide adequate fire equipment access and fire suppression resources to all developed and open space areas.	**Consistent.** The Project includes a 20 to 26-foot-wide fire lane which runs along the entire Project boundary. The Project site plan would be reviewed and approved by the Fire Department to ensure adequate access and fire suppression resources.

Policy PS-3.5: Establish and maintain optimal emergency response times for fire safety. Require new development to ensure that City response times and service standards are maintained.	**Consistent.** As discussed in Section 15, *Public Services*, the Project is not anticipated to result in a substantial demand in public services. In addition, the Project developer would be required to pay property taxes that may be used to fund improvements and added resources, as needed.
GOAL PS-4.0: Minimize risks to life, property, and the environment associated with producing, using, storing, or transporting hazardous materials.	**Consistent.** As discussed in Section 9, *Hazards and Hazardous Materials*, mandatory compliance with applicable laws and regulations related to the routine transport, use, and disposal of hazardous materials during construction and operational activities at the Project site would limit potentially significant hazards. A Phase I ESA prepared for the Project site had determined a REC related to contaminated soils onsite. However, with implementation of MM HAZ-1, impacts would be less than significant.
Policy PS-4.1: Assess potential risks of disposing, transporting, manufacturing and storing existing hazardous materials, and develop appropriate mitigation measures in case of accidents.	**Consistent.** As discussed in Section 9, *Hazards and Hazardous Materials,* a Phase I ESA had been conducted at this site, which found a REC related to contaminated soils onsite. With implementation of MM HAZ-1, as described above, impacts would be less than significant. In addition, the Project would be required to develop and submit a Hazardous Materials Business Emergency Plan to the County of Orange Environmental Health Division if the quantities of hazardous materials are over a specified threshold.
Policy PS-4.2: Prohibit new disposal, transport, manufacture, and storage of hazardous materials within the City without a mitigation plan in case of accidents. Hospitals meeting current state and federal standards are exempt.	**Consistent.** Under the jurisdiction of the County of Orange Environmental Health Division, the Project would be required to disclose hazardous materials used onsite and to develop a Hazardous Materials Business Emergency Plan if reported quantities of materials are over a specified threshold.
Policy PS-4.3: Identify hazardous materials dumpsites, and ensure that the sites are cleaned in conformance with applicable federal and state laws prior to the establishment of new uses.	**Consistent.** As discussed in Section 9, *Hazards and Hazardous Materials*, PCB levels of the soils onsite exceed the TSCA threshold of 1 ppm. With implementation of MM HAZ-1, impacts related to hazardous materials would be less than significant.
Policy PS-4.4: Ensure that the public is protected from fires, noxious fumes, and other hazards within the City's industrial area.	**Consistent.** The Project-specific fire site plan would be reviewed and approved by the Fire Department to ensure adequate levels of protection. As previously mentioned, mandatory compliance with applicable laws and regulations would limit the release of noxious fumes and other hazardous onsite.
Policy PS-7.2: Promote and integrate crime-preventive characteristics and design features into all phases of the planning and development process.	**Consistent.** The Project would be required to comply with Chapter 15.52, *Building Security Standards*, of the Municipal Code. The Project would include the installation of streetlights, a 6-foot-high CMU wall along the northwest corner of the site, and 7-foot-high metal gates with knox-boxes to secure the storage units. The proposed landscaping would also screen the perimeter of the Project.
Policy PS-7.3: Maximize natural surveillance through physical design features, including, but not limited to, visible entryways from surrounding structures and businesses; well-defined and visible walkways and gates; well-lighted driveways, walkways, and exteriors; and landscaping that preserves or enhances visibility.	
Policy PS-7.6: Continue to involve the Orange Police Department in the project design and review process.	**Consistent.** As mentioned above, the Project would provide onsite lighting and fencing in order to limit security issues. In addition, the Crime Prevention Unit would review and approve site plans as necessary.

Policy N-1.2: Encourage new development projects to provide sufficient spatial buffers to separate excessive noise generating land uses and noise-sensitive land uses.	**Consistent.** The Project would include a 6-foot-high CMU wall along the northwest corner of the site. Additionally, noise impacts were determined to be less than significant.
Policy N-1.4: Ensure that acceptable noise levels are maintained near noise-sensitive uses.	**Consistent.** Construction and operation noise impacts would be less than significant as discussed in Section 13, *Noise.*
Policy N-6.1: Encourage the design and construction of industrial uses to minimize excessive noise through project design features that include noise control.	**Consistent.** The Project would include a 6-foot-high CMU wall along the northwest corner of the site. Additionally, noise impacts were determined to be less than significant.
Policy N-6.2: Encourage industrial uses to locate vehicular traffic and operations away from abutting residential zones as much as possible.	**Consistent.** The Project would be constructed within a Light Industrial designated area and is not directly adjacent to residential zones.
Policy N-7.1: Schedule City maintenance and construction projects so that they generate noise during less sensitive hours.	**Consistent.** Project construction would comply with City mandates on allowed construction times as per Section 8.24.050 of the Municipal Code.
Policy N-7.2: Require developers and contractors to employ noise minimizing techniques during construction and maintenance operations.	**Consistent.** Construction noise operations would be less than significant as discussed in Section 13, *Noise.*
Policy N-7.3: Limit the hours of construction and maintenance operations located adjacent to noise-sensitive land uses.	**Consistent.** Project construction would comply with City mandates on allowed construction times as per Section 8.24.050 of the Municipal Code. Construction noise impacts would be less than significant to sensitive receptors.
Policy N-7.4: Encourage limitations on the hours of operations and deliveries for commercial, mixed-use, and industrial uses abutting residential zones.	**Consistent.** The Project does not abut any residential zones. In addition, as discussed in Section 13, *Noise,* operational noise impacts would be less than significant to the nearest sensitive receptors.
GOAL CR-1.0: Identify and preserve potential and listed historic resources, including buildings, structures, objects, sites, districts, and archaeological resources citywide.	**Consistent.** As discussed in Section 5, *Cultural Resources***,** a Cultural Resource Assessment was conducted, and no historical resources were found. No impacts to historical resources would occur and impacts to archaeological resources would be less than significant with the Project's incorporation of MM CUL-1, which includes provisions for incidental discoveries.
Policy CR-1.6: Promote the preservation of cultural and historical resources controlled by governmental agencies, including those related to City, School District, and other agencies.	**Consistent.** As discussed in Section 5, *Cultural Resources***,** a Cultural Resource Assessment was conducted, and no historical resources were found. No impacts to historical resources would occur and impacts to archaeological resources would be less than significant with the Project's incorporation of MM CUL-1, which includes provisions for incidental discoveries.
GOAL CR-4.0: Identify and preserve archaeological and cultural resources.	**Consistent.** A Cultural Resource Assessment was conducted onsite, and no resources were found. As discussed in Section 5, *Cultural Resources*, in the event that unanticipated resources are discovered during grading activities, the Project incorporates MM CUL-1 to mitigate potential impacts to resources.
Policy CR-4.1: Identify, designate, and protect historically and culturally significant archaeological resources or sites.	
Policy INF-1.6: Require that new developments fund fair-share costs associated with City provision of water, sewer, and storm drain service and are consistent with City and service provider plans to complete needed improvements and funding capacity for such improvements.	**Consistent.** The Project applicant would be required to pay applicable development impact fees as required by City regulations.
Policy INF-3.6: Require that new developments fund fair-share costs associated with City provision of right-of-way maintenance services and are consistent with City and service provider plans to complete needed improvements and funding capacity for such improvements.	**Consistent.** The Project applicant would be required to pay applicable development impact fees as required by City regulations.

Policy INF-4.2: Continue to require utilities to be placed underground for new development.	**Consistent.** The Project would include connections to existing underground utilities. New above ground utilities would not be constructed as part of the Project.
Policy UD-3.3: Strengthen the urban form of the City's commercial, industrial, institutional, and mixed-use districts by working within the character of the existing historical and architectural fabric of the community, while allowing for the addition of complementary new development and urban design elements.	**Consistent.** As shown in Figure 8a – 8c, *Elevations Building A – Elevations Building C,* the Project would establish an architectural presence through emphasis on building finish materials (brick, stucco) and would include shades of beige, grey, and green to be consistent with surrounding light industrial buildings.
GOAL ED-1.0: Sustain a diversified economic base and strong fiscal stability.	**Consistent.** The Project would construct a self-storage facility which would contribute to the City's economy.
Policy ED-1.1: Provide for land uses that allow a variety of retail, service, manufacturing, institutional, office, and recreational businesses to locate in Orange.	**Consistent.** The Project would construct a mixed self-storage/office facility within the light industrial designated area.
Policy ED-1.3: Retain industrial land for businesses that provide jobs for manufacturing and processing of goods and create local revenue sources.	**Consistent.** The Project would redevelop the existing manufacturing buildings to construct a self-storage facility, a permitted use within the light industrial land use designation. Operation of the self-storage facility would generate local income for the City.
Policy ED-1.4: Encourage physical expansion of manufacturing operations and research and development businesses within light industrial and manufacturing areas.	**Consistent.** The existing manufacturing buildings total 47,932 SF. The Project would expand operations through the development of three self-storage facilities with ancillary office space totaling 133,372 SF.
GOAL ED-3.0: Strengthen the City's economic base and stimulate employment through new commercial and industrial development and expansion.	**Consistent.** The Project would include redevelopment of the existing manufacturing buildings for a larger self-storage facility with ancillary office space, which would generate an increased revenue.
Policy ED-6.1: Provide and maintain infrastructure adequate to support growth and expansion of commercial, industrial, and institutional areas, including water, sewer, streets, curbs, gutters, sidewalks, storm drains, access, and parking improvements.	**Consistent.** The Project would install onsite water, sewer, and storm drainage infrastructure to accommodate operation of the Project.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

None.

Sources

City of Orange General Plan. 2010. [online]: https://www.cityoforange.org/our-city/departments/community-development/general-plan. Accessed May 17, 2023.

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

Impact Analysis:
a) The Project site is designated as Mineral Resource Zone 3 (MRZ-3) by the California Geological Survey, which is defined as an area containing mineral deposits whose significance cannot be evaluated from available data. The Project site is an urban infill site that is fully paved with asphalt and is surrounded by developed areas. The Project site and vicinity are not currently used for mining activities and have not been historically used for mining activities. Additionally, the City's General Plan EIR determined that no impacts would occur to mineral resources through development of the General Plan (City of Orange, 2010). Thus, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state, and impacts would not occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

City of Orange General Plan Program Environmental Impact Report. March 2010. [online]: https://www.cityoforange.org/391/General-Plan. Accessed May 15, 2023.

CGS (California Geological Survey). 1994. Open File Report 94-15: Generalized Mineral Land Classification of Orange County, California. Plate 1. [online]: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc. Accessed May 15, 2023.

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

The discussion below is based on the Noise Impact Analysis prepared by LSA in April 2023 (included as Appendix J).

Impact Analysis:

a) Potential increase in ambient noise levels in the vicinity of the Project site were evaluated for surrounding receptors. Sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. The City Orange General Plan Noise Element defines noise-sensitive uses as residences, hospitals, convalescent and day care facilities, schools, and libraries[31]. The nearest sensitive receptors to the Project site are:

- **South**: Existing single-family and multi-family residences approximately 330 feet south of the Project site's boundary line.
- **Southwest**: Existing Sycamore Elementary School approximately 1,830 feet southwest of the Project site's boundary line. Because this receptor is over 0.25 mile from the Project site, it is not expected that Project-related noise would contribute to the existing environment and is therefore not considered in this analysis.

Noise Standards

Construction Noise Standards

Section 8.24.50(I) of the Municipal Code exempts construction noise if construction activities occur between the hours of 7:00 AM and 8:00 PM, Monday through Saturday, or between the hours of 9:00 AM and 8:00 PM on Sundays and federal holidays. Since the City does not have daytime construction noise level limits for construction activities that occur within the specified hours of the Orange Municipal Code, construction noise impacts were assessed using criteria from the Federal Transit Administration *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual)[32]. Table NOI-1, *Daytime*

[31] City of Orange. General Plan EIR Noise Element. Available online at: https://www.cityoforange.org/home/showpublisheddocument/212/637698172563500000. (Accessed June 2023).

[32] Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. September 2018. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (Accessed June 2023).

Construction Noise Criteria, below, shows the FTA's Detailed Assessment Construction Noise Criteria based on the composite noise levels per construction phase.

Table NOI-1: Daytime Construction Noise Criteria

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

Source: Appendix J

Operational Noise Standards

Table N-3 and Table N-4 from the City's General Plan Noise Element list the maximum allowable noise levels from mobile and stationary sources, based on land use designations. The Project site has a General Plan Land Use designation of Light Industrial, which has no established mobile source thresholds. Table NOI-2 below lists the City's standards for noise levels from stationary sources at the nearest sensitive receptor, per Section 8.24.040 of the Municipal Code.

Table NOI-2: Maximum Allowable Noise Exposure – Stationary Noise Sources

Noise Level Descriptor	Exterior Noise Level Criteria	
	Daytime (7:00AM to 10:00 PM)	Nighttime (10:00PM to 7:00AM)
Hourly Equivalent Level (L_{eq}), dBA	55 dBA L_{eq}	45 dBA L_{eq}
Maximum Level (L_{max}), dBA	70 dBA L_{max}	65 dBA L_{max}

Notes:
1. These standards apply to new or existing noise sensitive land uses affected by new or existing non-transportation noise sources, as determined at the outdoor activity area of the receiving land use. However, these noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).
2. Each of the noise levels specified above should be lowered by five dB for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. Such noises are generally considered by residents to be particularly annoying and are a primary source of noise complaints. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).
3. No standards have been included for interior noise levels. Standard construction practices that comply with the exterior noise levels identified in this table generally result in acceptable interior noise levels.
4. The City may impose noise level standards which are more or less restrictive than those specified above based upon determination of existing low or high ambient noise levels. If the existing ambient noise level exceeds the standards listed in Table C, then the noise level standards shall be increased at 3 dB increments to encompass the ambient environment. Noise level standards incorporating adjustments for existing ambient noise levels shall not exceed a maximum of 70 dB Leq.
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level
Source: Appendix J

Existing Ambient Noise Levels

To assess existing noise levels, LSA conducted two long-term noise measurements in the vicinity of the Project site from March 7 through March 8, 2023. A description of the locations and the existing noise levels are provided in Table NOI-3. *Long-Term 24-Hour Ambient Noise Monitoring Results*, below. The calculated CNEL levels range from 60.5 dBA CNEL to 66.3 dBA CNEL. Hourly noise levels at surrounding sensitive uses are as low as 48.0 dBA L_{eq} during nighttime hours and 53.1 dBA L_{eq} during the daytime hours.

Table NOI-3: Long-Term 24-Hour Ambient Noise Monitoring Results

Location		Daytime Noise Levels[1] (dBA L_{eq})	Evening Noise Levels[2] (dBA L_{eq})	Nighttime Noise Levels[3] (dBA L_{eq})	Daily Noise Levels (dBA CNEL)
LT-1	Northeast corner of the Project site near a gated fence adjacent to the railway line, approximately 95 ft away from Batavia Street centerline	59.6-66.3	54.8-57.6	49.5-65.6	66.3
LT-2	West of the 533 North Citrus Street, on a utility pole, approximately 310 ft away from Batavia Street centerline	53.1-57.4	51.8-55.6	48.0-58.2	60.5

Note: Noise measurements were conducted from March 7 to March 8, 2023, starting at 2:00 p.m.
[1] Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 7:00 p.m.
[2] Evening Noise Levels = noise levels during the hours from 7:00 p.m. to 10:00 p.m.
[3] Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.
dBA = A-weighted decibels
CNEL = Community Noise Equivalent Level
ft = feet
L_{eq} = equivalent continuous sound level
Source: Appendix J

Construction Impacts

Construction is expected to occur over 13 months and would occur within the hours permitted by the City of Orange Municipal Code. Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coatings. The assumptions regarding the construction equipment to be used, the mix of equipment to be used at each stage of construction, and the placement of the construction equipment on the Project site, as well as the details regarding the noise level projection methodology, are set forth in Appendix J.

Table NOI-4, *Potential Construction Noise Impacts at Nearest Receptor*, below, shows the nearest receptors and sensitive uses to the Project site, their distance from the center of construction activities, and composite noise levels expected during construction. These noise level projections do not consider intervening topography or barriers.

Table NOI-4: Potential Construction Noise Impacts at Nearest Receptor

Receptor (Location)	Composite Noise Level at 50 ft[1]	Distance (ft)	Composite Noise Level (dBA L_{eq})
Industrial Uses (South)	88	165	78
Industrial Uses (North)		200	76
Industrial Uses (West)		290	73
Industrial Uses (East)		380	70
Residence (South)		580	67

[1] The composite construction noise level represents the site preparation and paving phases which are expected to result in the greatest noise level as compared to other phases
PPV = peak particle velocity
Source: Appendix J

While construction noise will vary, it is expected that composite noise levels during construction at the nearest off-site industrial uses to the west and east would reach 78 dBA L_{eq} while construction noise levels would approach 67 dBA L_{eq} at the nearest sensitive residential use to the west during daytime

hours. Construction-related noise impacts would remain below the 80 dBA L_{eq} and 90 dBA L_{eq} 1-hour construction noise level criteria for residential and industrial land uses as established by the FTA, referenced in Table NOI-1. Project construction would result in an increase in vehicles traveling to and from the site as haul truck trips, vendor truck trips, and worker trips would occur. However, the most intensive construction phase would result in approximately 230 haul trips and 30 worker trips per day during Project grading (Appendix A). Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance (passing trucks at 50 ft would generate up to 84 dBA Lmax), the effect on longer-term ambient noise levels would be small when compared to existing daily traffic volumes on Batavia Street. Because construction-related vehicle trips would not approach existing daily traffic volumes, traffic noise would not increase by 3 dBA CNEL (Appendix J). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment (Appendix J). Further, construction truck trips would utilize City-approved truck routes, which would route construction vehicles away from sensitive receptors as trucks would travel north on Batavia Street, west on Collins Avenue, south on Eckhoff Street, and west on Orangewood Avenue to SR-57.[33] Therefore, construction noise impacts would be less than significant.

Operational Impacts

Traffic Noise Impacts

As a result of the implementation of the Project, off-site traffic volumes on surrounding roadways have the potential to increase. Project trips generated were obtained from the Trip Generation Screening Memo (Appendix K) prepared for the Project. Due to the low daily increase in traffic volumes associated with the proposed project, there would be a minimal increase, less than 1 dBA, in traffic noise impact from project-related traffic to off-site sensitive receptors. As discussed in the Noise Impact Analysis (included as Appendix J), because an increase of less than 1 dBA is not perceptible to the human ear, noise impacts from the Project-related traffic to off-site sensitive receptors and impacts would be less than significant.

Stationary Noise Impacts

As they are currently in the existing setting, adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the Project's onsite heating, ventilation, and air conditioning (HVAC) equipment, truck deliveries and loading and unloading activities. To determine the future noise impacts from Project operations to the noise sensitive uses, a 3-D noise model, SoundPLAN, was used to incorporate the site topography as well as the shielding from the proposed buildings onsite (Appendix J).

Table NOI-5, *Daytime Exterior Noise Level Impacts*, and Table NOI-6, *Nighttime Exterior Noise Level Impacts*, below, show the combined hourly noise levels generated by HVAC equipment, trash bin emptying activities, cold storage fan units, and truck delivery activities at the closest off-site sensitive receptors.

[33] City of Orange. Approved Truck Route. May 2023. Available online at: https://www.cityoforange.org/home/showpublisheddocument/2272/637708802878222826

Table NOI-5: Daytime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Daytime Noise Level (dBA L_{eq})	Project Generated Noise Levels (dBA L_{eq})	Potential Operational Noise Impact?[1]
Residential (545 N Emerald Drive)	South	53.1	41.7	No

[1] A potential operational noise impact would occur if (1) the quietest daytime ambient hour is less than 55 dBA Leq and Project noise impacts are greater than 55 dBA Leq, OR (2) the quietest daytime ambient hour is greater than 55 dBA Leq and Project noise impacts are 3 dBA greater than the quietest daytime ambient hour.
Source: Appendix J

Table NOI-6: Nighttime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Nighttime Noise Level (dBA L_{eq})	Project Generated Noise Levels (dBA L_{eq})	Potential Operational Noise Impact?[1]
Residential (545 N Emerald Drive)	South	48.0	41.7	No

[1] A potential operational noise impact would occur if (1) the quietest daytime ambient hour is less than 55 dBA Leq and Project noise impacts are greater than 55 dBA Leq, OR (2) the quietest daytime ambient hour is greater than 55 dBA Leq and Project noise impacts are 3 dBA greater than the quietest daytime ambient hour.
Source: Appendix J

As shown in Tables NOI-5 and NOI-6, Project-generated noise levels would not exceed the residential use daytime noise standard of 55 dBA L_{eq} and would not exceed the residential nighttime noise standard of 45 dBA L_{eq}. Under both conditions, Project-generated noise levels would also be more than 5 dBA below the existing ambient noise levels, meaning that operations associated with the proposed Project would result in lower noise levels as compared to existing operations. Therefore, the impact would be less than significant, and no noise reduction measures are required.

Overall, construction and operational noise impacts would be less than significant, and no mitigation measures would be required.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact

b) Vibration refers to groundborne noise and perceptible motions, and has the potential to disturb people and damage buildings. Vibration levels calculated in root-mean-square (RMS), expressed in VdB, are best for characterizing human response to building vibration. Vibration levels calculated in peak particle velocity (PPV), expressed in inches per second, are best for characterizing potential for damage. (Appendix J.)

Vibration Standards
Human Annoyance Standards – FTA Manual
The City of Orange does not have vibration level thresholds for human annoyance. Therefore, vibration standards from the FTA Manual were used to analyze groundborne vibration impacts on human

annoyance[34]. Table NOI-7, *Human Annoyance Vibration Criteria*, below provides the criteria for assessing the potential for human annoyance from vibration levels in a building.

Table NOI-7: Human Annoyance Vibration Criteria

Land Use	Max L_v (VdB)[1]	Description of Use
Workshop	90	Vibration that is distinctly felt. Appropriate for workshops and similar areas not as sensitive to vibration.
Office	84	Vibration that can be felt. Appropriate for offices and similar areas not as sensitive to vibration.
Residential Day	78	Vibration that is barely felt. Adequate for computer equipment and low-power optical microscopes (up to 20x).
Residential Night and Operating Rooms	72	Vibration is not felt, but ground-borne noise may be audible inside quiet rooms. Suitable for medium-power microscopes (100x) and other equipment of low sensitivity.

Source: Appendix J

Vibration Damage - Caltrans Manual

Because the City Orange does not have numeric vibration level thresholds, the Caltrans Transportation and Construction Vibration Guidance Manual vibration damage thresholds were used to assess potential temporary construction-related impacts at adjacent receptors[35]. Caltrans guidelines show that a vibration level of up to 0.5 in/sec in PPV is considered safe for newer residential structures and modern industrial or commercial buildings and would not result in any construction vibration damage. For older residential structures, the construction building vibration damage criterion is 0.3 in/sec in PPV and for non-engineered timber and masonry buildings, the construction building vibration damage criterion is 0.2 in/sec in PPV.

Construction Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. As shown in Table NOI-8, *Vibration Source Amplitudes for Construction Equipment*, of the equipment expected to be used during construction, large bulldozers would generate approximately 0.089 PPV/sec or 87 VdB when measured at 25 feet. Based on the FTA Manual, reference vibration amplitudes for construction equipment were measured at a distance of 25 feet, which are shown in Table NOI-8, below.

Table NOI-8: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/Lv at 25 ft	
	PPV (in/sec)	Lv (VdB)[1]
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94

[34] Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. September 2018. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. (Accessed June 2023).

[35] California Department of Transportation. Transportation and Construction Vibration Guidance Manual. April 2020. Available online at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. (Accessed June 2023).

Hoe Ram	0.089	87
Large Bulldozer[2]	**0.089**	**87**
Caisson Drilling	0.089	87
Loaded Trucks[2]	**0.076**	**86**
Jackhammer	0.035	79
Small Bulldozer	0.003	58

[1] RMS vibration velocity in decibels (VdB) is 1 µin/sec.
[2] Equipment shown in **bold** are expected to be used on site.
µin/sec = microinches per second
ft = feet
FTA = Federal Transit Administration
in/sec = inch/inches per second
LV = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity decibels
Source: Appendix J

For potential vibration damage, the distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the construction boundary (Project setback line). For potential vibration annoyance, the distance is measured from the center of the construction activities to the surrounding uses. Table NOI-9, *Potential Construction Annoyance Impacts at Nearest Receptor*, and Table NOI-10, *Potential Construction Vibration Damage Impacts at Nearest Receptor*, below, show the vibration annoyance and vibration damage levels at the nearest receptors.

Table NOI-9: Potential Construction Annoyance Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (VdB) at 25 ft[1]	Distance (ft)[2]	Vibration Level (VdB)
Industrial Uses (South)	87	165	62
Industrial Uses (North)		200	60
Industrial Uses (West)		290	55
Industrial Uses (East		380	52
Residence (South)		580	46

[1] The reference vibration level is associated with a large bulldozer, which is expected to be representative of the heavy equipment used during construction.
[2] The reference distance is associated with the average condition, identified by the distance from the center of construction activities to surrounding uses.
VdB = vibration velocity decibels
Source: Appendix J

As previously stated, FTA thresholds at which vibration levels would result in annoyance would be 90 VdB for workshop type uses and 78 VdB for daytime residential uses. Vibration levels are expected to approach 62 VdB at the closest industrial uses to the south and 46 VdB at the closest residence to the west and would not exceed the annoyance thresholds.

Table NOI-10: Potential Construction Vibration Damage Impacts at Nearest Receptor

Receptor (Location)	Reference Vibration Level (PPV) at 25 ft[1]	Distance (ft)[2]	Vibration Level (PPV)
Industrial Uses (South)	0.089	5	0.995
Industrial Uses (North)		65	0.021
Industrial Uses (West)		7	0.601
Industrial Uses (East)		130	0.008
Residence (South)		380	0.002

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

The reference distance is associated with the peak condition, identified by the distance from the perimeter of construction ctivities to surrounding uses.
PV = peak particle velocity
ource: Appendix J

Vibration levels are expected to approach 0.995 in/sec PPV at the nearest surrounding structures to the south and would approach 0.601 in/sec PPV at the nearest surrounding structures to the west which would exceed the threshold of 0.2 in/sec PPV for building damage for non-engineered timber and masonry buildings. Vibration levels at all other buildings would be lower. Although construction vibration levels at the nearest buildings would have the potential to result in building damage, these vibration levels would no longer occur once construction of the Project is completed. In addition, the applicant has agreed to incorporate into the Project Mitigation Measure NOI-1, which would require vibration monitoring for structures within 15 feet of the Project site boundary to ensure that construction vibration would not result in building damage. With the incorporation of Mitigation Measure NOI-1 into the Project, vibration impacts during construction would be less than significant.

Operational Impacts
The Project would not generate vibration levels related to onsite operations. In addition, vibration levels generated from Project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on the reference vibration level for loaded trucks (0.076 in/sec PPV), structures greater than 20 ft from the roadways that contain Project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from Project-related traffic on the adjacent roadways would be less than significant, and no mitigation measures are required.

Significance Determination: Less than significant impact with mitigation incorporated.
Mitigation Measures:
MM NOI-1: Due to the close proximity to surrounding structures, the City of Orange (City) Director of Community Development, or designee, shall verify prior to issuance of demolition or grading permits, that the approved plans require that the construction contractor shall implement the following mitigation measures during project construction activities to ensure that damage does not occur at surrounding structures should heavy equipment be necessary within 15 feet (ft) of surrounding structures:

- Identify structures that are located within 15 ft of heavy construction activities and that have the potential to be affected by ground-borne vibration. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee.
- Develop a vibration monitoring and construction contingency plan for approval by the City Director of Community Development, or designee, to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits.
- At a minimum, monitor vibration during initial site preparation activities. Monitoring results may indicate the need for more or less intensive measurements.
- When vibration levels approach limits, suspend construction and implement contingencies as identified in the approved vibration monitoring and construction contingency plan to either lower vibration levels or secure the affected structures.

Significance Determination After Mitigation: Less than significant impact

c) The Project site is neither located within an airport land use plan, nor within two miles of a public airport. The nearest airports are the John Wayne Airport, located approximately 7.8 miles south of the Project site in the City of Santa Ana and the Fullerton Municipal Airport, located approximately 8.4 miles northwest of the Project site in the City of Fullerton. Therefore, the Project would not expose people residing or working in the Project site to excessive noise levels related to a public airport or public use airport. Thus, no impacts would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

Noise and Vibration Impact Analysis. April 2023. Prepared by LSA. (Appendix J).

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

Impact Analysis:

a) The Project would not involve the construction of any homes, businesses, or other uses that would result in direct population growth. The Project site has a General Plan land use designation of LI, which allows a maximum FAR of 1.0, and the self-storage facility with a FAR of 1.0. However, growth projections of the Orange General Plan were calculated using expected FAR for the land use type. The LI land use designation has an expected FAR of 0.50. Although development would be to the maximum allowed FAR, the Project proposes to employ a maximum of only four employees for the operation of the self-storage facility, result in a substantial increase in employment. In addition, the Project would not extend new infrastructure into unserved areas or other such improvements that could lead to indirect growth. Therefore, operation of the Project would not result in substantial population growth and impacts would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

b) No housing currently exists on the Project site and the site is currently zoned for industrial use and developed with non-residential buildings. Construction of the Project would not require the removal or displacement of existing housing, and therefore, would not require construction of replacement housing elsewhere. Thus, no impacts would occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

City of Orange General Plan Program Environmental Impact Report. March 2010. [online]: https://www.cityoforange.org/home/showpublisheddocument/240/637698173340500000. Accessed May 16, 2023.

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

Impact Analysis:

(a) i) Fire protection and other related services in the City of Orange are provided by the Orange Fire Department, which maintains eight stations (City of Orange, 2010). According to the City's General Plan EIR, the Fire Chief and management staff of the City of Orange monitor service needs to evaluate adequacy of service and annual budget changes. In addition, the EIR states that staffing ratios and response times are not used to determine service adequacy. The closest fire station to the Project site is Station No. 5, located at 1345 W. Maple Avenue, which is located approximately 0.8 roadway miles northeast of the Project site. Table PS-1, *Station No. 5 Staffing and Response Data – 2022*, below summarizes data collected from Station No. 5 in 2022.

Table PS-1: Station No. 5 Staffing and Response Data - 2022

	Staffing	Responses	Average Response Time
Engine 5	2 Paramedics, 1 EMT	3,138	4 minutes 51 seconds
Ambulance 5	2 EMTs	367	4 minutes 37 seconds
Rescue 25	2 Paramedics	36	-

Source: Robert Prendergast, personal communication, March 23, 2023

Operation of the proposed self-storage facility may result in an incremental increase in demand for fire protection and emergency medical services. However, the Project would be required to adhere to the California Fire Code, as included in the City's Municipal Code and ensured through the City's permitting process. Further, the Project would redevelop the Project site with buildings that meet currently Title 24 and California Fire Code requirements. In addition, buildout of the Project would not directly increase the City's population, as discussed in Section 14, *Population and Housing*. Thus, even if there were an increase in fire service demands from the Project, it would be minimal and would not require construction of a new or physically altered fire station that could cause environmental impacts. Therefore, the Project would not result in the need for new or expanded fire service facilities and no impacts related to fire services would occur.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

(a) ii) The Project site is located within the service area of the Orange Police Department. The main police station is located at 1107 North Batavia Street, approximately 0.6 mile north of the Project site. According to Officer McMullin (2023), as of October 31, 2022, the Department was staffed by 147 sworn officers and 81 non-sworn personnel. In 2022, the average emergency response time was 4.5 minutes, while the average non-emergency response time was 12.6 minutes (P. McMullin, personal communication, March 9, 2023). The Orange Police Department does not use officer-to-population ratio or standard response time metrics to evaluate service adequacy (City of Orange, 2010). As stated in the City's General Plan EIR, factors used to evaluate police service needs include demographics, services calls, crime trends, and population.

The Project would redevelop the existing site with a new self-storage facility. Crime and safety issues during Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. During operation, the Project is anticipated to generate a typical range of police service calls, such as theft, disturbances, and vandalism. Security concerns would be addressed by installation of a 6-foot-high CMU wall along the northwest corner of the site and a CMU wall along the western perimeter of the site. The drive aisle would be secured and enclosed by two 7-foot-high metal swing entry gates. In addition, the Project would include security lighting along the proposed building. Due to the nature of the Project, there would be a potential to place additional demands on the Police Department not previously planned for. However, to ensure adequate services are provided and to minimize the demands on police services, security and design measures which employ defensible space concepts would be utilized throughout the formation of development and construction plans. These measures would incorporate the concepts of Crime Prevention through Environmental Design (CPTED), which involves the placement, and orientation of structures, access and visibility of common areas, placement of doors, windows, addressing, lighting and landscaping. CPTED promotes public safety, physical security and allows citizens the ability to monitor activity. In addition, the project shall comply with the requirements established in Chapter 15.52 of the Orange Municipal Code (Building Security Ordinance #6-18). Conditions related to CPTED and the Orange Building Security Standards would be included as part of the Project. Therefore, the Project would not result in a substantial adverse change to existing demand for police services, and the Project would not result in the need for new or expanded police facilities. Potential impacts related to police services would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

(a) iii) The development of the Project would not include residential units which would generate new students. The proposed self-storage facility would require approximately four employees and substantial in-migration of employees that could generate new students is not anticipated to occur. Therefore, the Project would not result in the need for new or expanded school facilities, and impacts related to school services would not occur.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities would be addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school

facilities in excess of fees set forth in the Government Code. The Project would be required to contribute fees to the Orange Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

(a) iv) As described previously, the Project would consist of a self-storage facility on a site that is currently developed for manufacturing uses. The Project would neither construct any residential facilities, nor create an additional need for housing. As discussed in Section 14, *Population and Housing,* the Project would require approximately four employees for operation. Therefore, the Project would not generate an increase in the use of the existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project does not propose the construction or expansion of recreational facilities or parks which could negatively impact the environment. In addition, no offsite parks or recreational improvements are proposed or required as part of the Project. Thus, potential Project impacts related to park facilities would not occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

City of Orange General Plan Program Environmental Impact Report. March 2010. [online]: https://www.cityoforange.org/home/showpublisheddocument/240/637698173340500000. Accessed May 16, 2023.

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

Impact Analysis:

a) The City of Orange maintains the local parks and provides recreational services for the Project area. The closest park to the Project site is Killefer Park, approximately 0.8 roadway miles east. The Project would not include any residential facilities and would not cause an increase in residential population. As previously discussed, the Project would not result in substantial unplanned population growth and would employ only four employees. Therefore, the Project would not create an increase the use of existing recreational facilities such that physical deterioration of the facility would occur or be accelerated. Therefore, the Project's potential impacts related to physical deterioration of a recreation facilities would be less than significant.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

b) As previously discussed, the Project would construct a self-storage facility on a site that is currently developed with a manufacturing facility. As previously discussed, the Project would require only four employees and therefore would not directly increase the residential population of the City. Therefore, the Project would not generate additional need for parkland such that the construction or expansion of recreational facilities would be required. Additionally, the Project does not propose the construction or expansion of recreational facilities or parks. Thus, no potential Project impacts would occur from the construction of new or expanded recreational facilities.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

None.

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

The discussion below is based on the Trip Generation Screening Memo prepared by EPD Solutions in January May 2023 (included as Appendix K) and the VMT Screening Memo prepared by EPD Solutions in May 2023 (included as Appendix L).

Impact Analysis:

a) Public transit in the Project vicinity is provided by the Orange County Transit Authority (OCTA). Line 53, Anaheim to Irvine is located at the intersection Walnut Avenue and Main Street, 0.5 miles southwest, and Line 59, Anaheim to Irvine is located at the intersection of Glassell Street and Mayfair Avenue, 0.9 miles east. The Project would not include any changes to existing transit access. No bike lanes exist on the section of Batavia Street within the Project site vicinity and the Project would not include any changes to the existing bicycle facilities. The Project does not propose any changes to the City's circulation system. As such, the Project would not conflict with any transit, bicycle, or pedestrian facilities.

The City's Transportation Demand Management (TDM) Program applies to new commercial, industrial, and mixed-use development estimated to employ over 100 people, per Section 10.83.04 of the Municipal Code. This proposed Project would develop a self-storage facility with ancillary offices, and would employ approximately 4 employees. Therefore, the Project would not be subject to the guidelines established by the TDM Program.

As per the City of Orange Guidelines for TIA Section 1, a complete level of service (LOS) transportation impact analysis (TIA) is not required if a project meets any of the following criteria[36]:

1. The project generates less than 100 peak hour trips.
2. The project generates less than 1,600 average daily trips (ADT) on the Arterial Highway System.
3. The project would not add 51 or more peak hour trips to any intersection.
4. The project would not result in variations from the standards and guidelines.
5. A City Traffic Engineer determines the project does not have unique characteristics that warrant evaluation.

[36] City of Orange. City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment. July 2020. Available online at: https://www.cityoforange.org/home/showpublisheddocument/2088/637708760828930000. (Accessed June 2023).

Table T-1, *Project Trip Generation*, shows the Project's trip generation for the proposed self-storage facility. The Project would generate 193 daily trips with 12 a.m. peak hour trips and 20 p.m. peak hour trips; therefore, the Project would meet the requirements for criteria 1, 2, and 3. In addition, the Project is consistent with the General Plan Light Industrial land use designation and its associated standards and does not have unique characteristics that warrant evaluation (Appendix K). Therefore, the Project would meet all screening requirements and would not require a LOS analysis.

Table T-1: Project Trip Generation

				AM Peak Hour			PM Peak Hour		
Land Use	**Rate**	**Units**	**Daily**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Proposed Self-Storage[1]	133.378	TSF	193	7	5	12	9	11	30

TSF=Thousand Square Feet
[1]Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition, 2021*. Land Use Code 151 – Mini Warehouse.

As concluded in the LOS Screening Memo, the Project does not have unique characteristics anticipated to conflict with the City's circulation system. (Appendix K.) Therefore, the Project's potential impacts related to the circulation system would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

b) In response to Senate Bill (SB) 743, Section 15064.3 was added to the CEQA Guidelines, which became effective on July 1, 2020. CEQA Guidelines Section 15064.3 - Determining the Significance of Transportation Impacts states that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. The Project would generate approximately 193 daily trips, including 12 trips during AM peak hours and 20 trips during PM peak hours (Appendix L).

The City of Orange adopted VMT impact guidelines on July 14, 2020 to identify projects that would be considered potential VMT impacts.[37] If a project meets one of the following criteria, then impacts would be considered less than significant and no further analysis of VMT would be required.

1. The project is located within a Transit Priority Area (TPA), has a FAR of more than 0.75, and includes less parking than required for the use.
2. The project is located in a low VMT generating area.
3. The project is generating less than 110 daily vehicle trips.

The Project is analyzed under each criterion, below.

Screening Criteria 1 - Transit Priority Area Screening: According to the City's Guidelines, projects located in a TPA, with a FAR of more than 0.75, and includes less parking for the use than required by the City may be presumed to have a less than significant impact. The Project is located in a TPA and has an FAR of 1.0; however, the Project includes more parking than required. Therefore, the Project would not satisfy the requirements of Screening Criteria 1.

[37] See pages 11-14 of the City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment. July 2020. Available online at: https://www.cityoforange.org/home/showpublisheddocument/2088/637708760828930000. (Accessed June 2023).

Screening Criteria 2 - Low VMT Area Screening: The City utilized the NOCC+, a private tool adopted by the City of Orange along with other northern Orange County jurisdictions, to determine if the Project is located in a low VMT generating area. A review of the NOCC+ output indicated that the Project is located within a low VMT generating zone (Appendix L). Therefore, Screening Criteria 2 is met.

Screening Criteria 3 – Daily Trips less than 110 daily vehicle trips: As per the City's Guidelines, projects which would generate fewer than 110 average daily vehicle trips would not cause a substantial increase in the total citywide or regional VMT. As shown in Table T-1, the Project would generate a total of 193 daily trips. Therefore, Screening Criteria 3 is not met.

As discussed above, the Project site is located within a low VMT generating zone. As such, further analysis of VMT is not required and impacts related to VMT would be presumed to be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

c) Vehicle access to the Project site would be provided via two 30-foot-wide driveways on Batavia Street (as shown in Figure 3-1, *Conceptual Site Plan*). Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site area. The Project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. The Project would include a 20-foot-wide minimum fire lane that would also provide trucks and passenger vehicles access throughout the site. The design of the Project, including the internal roadway and driveways, is subject to the City's development standards and would be reviewed to ensure compliance with applicable building and fire codes. As a result, the Project's potential impacts related to vehicular circulation design features would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

d) The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access for emergency vehicles to the Project site or adjacent areas. During construction of the Project, the adjacent roadways would remain open to ensure adequate emergency access to the Project site and its vicinity, and impacts related to inadequate emergency access during construction activities would not occur.

Access to the Project site is provided via two driveways along Batavia Street (as shown in Figure 3-1, *Conceptual Site Plan*). The Project site includes a 20-foot-wide minimum fire lane within the site. The driveway would be constructed pursuant to existing California Fire Code regulations, as verified through the City's permitting process. Thus, potential impacts related to inadequate emergency access would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.

Significance Determination After Mitigation: Less than significant impacts.

Existing Plans, Programs, or Policies

None.

Sources

Trip Generation Screening Analysis. January 2023. Prepared by EPD Solutions, Inc. (Appendix K).

Vehicle Miles Traveled (VMT) Screening Analysis. March 2023. Prepared by EPD Solutions, Inc. (Appendix L).

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

The discussion below is based on the Archaeological and Paleontological Resources Records Results prepared by BFSA Environmental Services in May 2023 (included as Appendix B).

AB 52

The Project would be required to comply with AB 52 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

In compliance with this requirement, the City sent letters on May 25, 2023 to the following tribes that have previously requested notification of development projects:

- Gabrieleno Band of Mission Indians – Kizh Nation
- San Gabriel Band of Mission Indians
- Torres Martinez Desert Cahuilla Indians
- Gabrielino/Tongva Nation

In response, the Gabrieleno Band of Mission Indians – Kizh Nation submitted information stating that overall Project area is within the Tribe's Ancestral Tribal Territory. Consultation occurred with the Tribe via email on July 17, 2023, and was closed on July 27, 2023.

Impact Analysis:

a) The Project site consists of one fully disturbed 3.22-acre parcel. The site is fully developed with two light manufacturing buildings and a storage area. Based on a records search of the California Historic Resources Information System and field survey, the Project site does not contain any known historic resources (Appendix B). In addition, a Sacred Lands File search from the Native American Heritage

Commission indicated negative results for the presence of sacred sites. Therefore, the Project would not result in impacts to historic resources that are listed or eligible for listing.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

b) As described previously in Section 5, *Cultural Resources*, no archaeological resources were identified within the Project site as part of the records search with SCCIC (Appendix B). The Geotechnical Investigation states that the onsite soils consist of alluvial soil overlying late to middle Pleistocene aged old alluvial fan deposits. However, due to the Project site's location in an area where Native American tribes are known to have a cultural affiliation, there is the possibility that archaeological resources, including tribal cultural resources, could be encountered during ground disturbing construction activities. As per AB 52 consultation with the Admin Specialist of the Gabrieleno Band of Mission Indians – Kizh Nation, the Project site was determined to be within the ancestral territory of the Tribe. Construction activities would have the potential to impact TCRs that may be present in subsurface soil layers.

Therefore, Mitigation Measure TCR-1 through TCR-3 have been included to address the potential impacts to TCRs. Mitigation Measure TCR-1 requires onsite monitoring by a Native American monitor from the Gabrieleño Band of Mission Indians – Kizh Nation or approved representative. Mitigation Measure TCR-2 requires that upon discovery of a TCR, all construction activities in the immediate vicinity would cease until proper assessment and recovery of the resource has been completed. Mitigation Measure TCR-3 requires that upon discovery of Native American human remains, the procedures outlined in Public Resource Code 5097.9 and California Health and Safety Code Section 7050.5 shall be carried out. As described previously and included as PPP CUL-1, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, implementation of Mitigation Measures TCR-1 through TCR-3 would reduce potential impacts to tribal cultural resources to a less than significant level.

Significance Determination: Less than significant with mitigation incorporated.
Mitigation Measures:
Mitigation Measure TCR-1: Native American Monitoring.

A. The Project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-

disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

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

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

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

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

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

Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. California Health and Safety Code Section 7050.5. Listed previously in Section 5, *Cultural Resources*.

Sources

Archaeological and Paleontological Resources Records Results. May 2023. Prepared by BFSA Environmental Services. (Appendix B).

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

Impact Analysis:

a) The Project would include construction of three self-storage buildings that involve water, drainage, and electrical infrastructure as described below.

Water
The City's Water Division of the Public Works Department supplies potable water for residents and businesses. The Project would connect to the existing 0.75-inch irrigation service line, 2-inch domestic service line, and 8-inch fire service line, which connect to the existing 12-inch diameter water line within Batavia Street. A 0.75-inch irrigation backflow preventer, 2-inch domestic backflow preventer, and 8-inch fire backflow preventer would be installed behind the property line. No expansion of the existing public water infrastructure would be required. The onsite water system would convey water supplies to the proposed self-storage buildings and landscaping through plumbing and landscaping fixtures that would be compliant with the CalGreen Plumbing Code for efficient use of water. Installation of the new water infrastructure would only serve the Project and would not provide new water supplies to any offsite areas. Impacts would be less than significant.

Wastewater
The Orange County Sanitation District (OCSD) treats wastewater from the City. Local sewer lines are owned and maintained by the City while the District owns, operates, and maintains the large trunk sewers of the regional wastewater conveyance system. The Project would connect to the existing 6-inch, onsite sewer service lines which would convey wastewater to the 15-inch sewer line within Batavia Street. The existing sewer lines would accommodate development of the Project site and would not require expansion to serve the Project. Impacts would be less than significant.

Stormwater
The Project would install a 48-inch storage pipe that would convey stormwater runoff into a Modular Wetland System for treatment, located at the northwestern corner of the site. To match the hydrologic characteristics of the existing site, the required design capture volume of the site would be 7,491 cubic

feet, and the storage pipe would provide a capacity of 7,521 cubic feet. Therefore, the Project would meet treatment guidelines needed for a 2-year, 24-hour storm event (Appendix I). The Project would not require or result in the construction of new off-site storm water drainage facilities or expansion of existing off-site facilities and impacts would be less than significant.

Electric Power
The Project would require the relocation of an existing Southern California Edison utility pole from within the Project site to the eastern property line and construction of a transformer at the southeast corner of the Project site. However, the Project would connect to the existing infrastructure and would not require the construction of new electrical distribution facilities . Impacts would be less than significant.

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

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

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

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

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

Source: Orange 2020 UWMP.

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

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

Source: Orange 2020 UWMP

Water use projections are based on expected land use development. The Project buildout is consistent with the Project site's existing Light Industrial land use designation and M-2 zoning; thus, water usage of the Project has been accounted for within the 2020 UWMP. Additionally, the Project would employ only approximately four employees during Project operation. The General Plan EIR uses a water demand factor of 0.24 acre-feet per person per year. Based on this factor, the Project would result in a water demand of approximately 0.96 acre-feet per year. In addition, potable water would be used in the generation of wastewater. The General Plan EIR uses a wastewater generation rate of 104 gallons per person per day. Therefore, the Project would result in an additional 0.47 acre-feet per year for a total annual water demand of 1.43 acre-feet. Thus, the Project is not anticipated to generate a substantial increase in demand for potable water. The Water Service Reliability and Drought Risk Assessment section of the UWMP concludes that supply and demand are forecasted to be balanced through 2045, under normal years, single-dry years, and multiple-dry year scenarios[38]. Therefore, the Project's potential impacts related to water supplies would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

c) The City receives wastewater treatment service from the Orange County Sanitation District (OCSD). Two wastewater treatment plants handle wastewater flow from the City of Orange: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. The two facilities have a combined design capacity of 332 million gallons per day (mgd) (EPA, 2021). The facilities treat an average daily wastewater flow of 189 mgd (OCSAN, 2021), leaving a remaining capacity of 143 mgd.

The General Plan EIR uses a wastewater generation rate of 104 gallons per person per day. Based on this factor, and an estimated employee generation of four persons, the Project would generate approximately 416 gallons per day (gpd) of wastewater or 0.0004 mgd per day. Therefore, the Project's wastewater generation would be within the current capacity for the OCSD and no new or expanded offsite facilities are required. The Project's potential impacts related to wastewater generation would be less than significant.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.

[38] See page 7-1 of the City of Orange 2020 UWMP: https://www.cityoforange.org/home/showpublisheddocument/1540/637873464981170000

Significance Determination After Mitigation: Less than significant impact.

d) The landfills that serve the City of Orange include Prima Deshecha Landfill in San Juan Capistrano, the Olinda Alpha Sanitary Landfill in Brea, and the Frank R. Bowerman Landfill in Irvine. The Orange County Integrated Waste Management Department owns and operates these landfills. Information regarding these landfills is detailed on Table UT-2, *Landfill Capacity*, below. Based on the average daily disposal calculated from the 2022 annual disposal tonnage, the landfills have a combined total daily disposal availability of 7,473 tons per day (tpd).

Table UT-3: Landfill Capacity

Name	Max Daily Permitted (tpd)	Average Daily Tonnage (tpd)[1]	Available Daily Disposal (tpd)	Closure Date
Prima Deshecha Landfill	4,000	2,185	1,815	12/31/2102
Olinda Alpha Sanitary Landfill	8,000	6,847	1,153	12/31/2036
Frank R. Bowerman Landfill	11,500	6,995	4,505	12/31/2053

Source: CalRecycle 2022, CalRecycle 2023a, CalRecycle 2023b, CalRecycle 2023c

Construction

The Project would generate solid waste from construction and demolition debris during the short-term construction period. The demolition phase of construction involves removal of asphalt and the existing buildings. Based on the area of paved land and buildings, and the average thickness and mass of hardscape, demolition would result in approximately 10,767 tons of debris. Solid waste would be disposed of in accordance with local solid waste disposal requirements[39]. Additionally, Section 5.408.1 of the existing CalGreen Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 35 percent of the waste generated, or 3,768 tons of debris. As described in the Project Description, demolition is expected to take 15 days. As such, this would equate to approximately 251.2 tons of solid waste per day. The three landfills have a combined total daily disposal availability of 7,473 tons per day, which would be sufficient for the Project's construction-related landfill needs.

Operation

The CalEEMod solid waste generation rate for general light industrial land use is 1.24 tons per year per 1,000 square feet. Thus, the proposed self-storage facility would potentially generate approximately 165.4 tons of solid waste per year. However, at least 75 percent of the solid waste is required to be recycled pursuant to AB 341, which would reduce the volume of landfilled solid waste to approximately 41.4 tons per year, or 0.80 tons per week.

Additionally, in the event that business operations result in the generation of 2 cubic yards or more of commercial solid waste per week, the business would be required to arrange for organic waste recycling services pursuant to AB 1826[40].

[39] City of Orange solid waste regulations: https://www.cityoforange.org/our-city/departments/public-works/field-services-division/trash-recycling-and-organics/commercial

[40] Mandatory Commercial Organics Recycling Assembly Bill 1826: https://www.cityoforange.org/our-city/departments/public-works/field-services-division/trash-recycling-and-organics/commercial#:~:text=The%20California%20Legislature%20passed%20Mandatory,sending%20it%20to%20a%20landfill.

As described above, the supporting landfill facilities have a remaining capacity of approximately 7,473 tons per day. Thus, the landfills would be able to accommodate the addition of 0.51 tons of waste per week from operation of the Project. Implementation of the Project would result in less than significant impacts on landfill capacity.

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

Redeveloping existing site,

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

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

Impact Analysis:

a) The Project site is not located within a fire hazard zone (CAL FIRE, 2023). Additionally, the Project site is not located within an evacuation plan area, nor does it abut any generalized evacuation routes (Orange Fire Department). Therefore, Project construction activities would not interfere with emergency response in or evacuation plans for the Project site vicinity.

As previously discussed, the Project site would include a 20 to 26-foot-wide fire lane for emergency vehicle access during Project operation. Furthermore, the Project's development plans would be reviewed by the City to ensure adequate levels of emergency service could be provided to the Project site. Therefore, potential impacts related to an emergency response or evacuation would not occur.

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.

Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

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

Significance Determination: No impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: No impact.

Existing Plans, Programs, or Policies

None.

Sources

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

Impact Analysis:

a) As described in Section 4, *Biological Resources*, the Project site is located within an urban area and is fully disturbed. The site is currently developed with two light manufacturing buildings and a storage area. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) occur on the site. However, the Project site contains ornamental trees on the northern and eastern boundary of the site that may be utilized by nesting birds and raptors. Therefore, the applicant has agreed to incorporate Mitigation Measure BIO-1 into the Project, which requires that pre-construction surveys be conducted if vegetation is required to be removed during nesting bird season. With the incorporation of MM BIO-1 into the Project, impacts related to nesting birds would be reduced to a less than significant level.

As described in Section 5, *Cultural Resources*, the Project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. In addition, the Project would not result in significant impacts to nearby historic resources. However, in the unlikely event that potential archaeological resources are discovered during grading, excavation, or other construction activities, the applicant has agreed to incorporate Mitigation Measure CUL-1 into the Project. Mitigation Measure CUL-1 requires that work in the vicinity of a find be halted until the find can be assessed for significance by a qualified archaeologist to determine appropriate treatment. Therefore, potential impacts related to cultural resources would be reduced to a less than significant level. Likewise, as described in Section 18, *Tribal Cultural Resources*, the site has the potential to contain tribal cultural resources. Therefore, the applicant has agreed to incorporate Mitigation Measure TCR-1 into the Project, which requires monitoring of native soils to ensure that any inadvertent discovery of potential tribal cultural resources during ground-disturbing activities would be less than significant. [Confirm measure is necessary once tribal consultation occurs]

As described in Section 7, *Geology and Soils,* the Project site is underlain by sediments identified as late to middle Pleistocene-aged old alluvial fan deposits with a high potential for fossils starting at a depth

of five feet below the surface. Thus, the applicant has agreed to incorporate Mitigation Measure PAL-1 into the Project to require the preparation of a PRIMP and paleontological monitoring during ground-disturbance activities greater than five feet in depth within native soil. Incorporation of Mitigation Measure PAL-1 into the Project would reduce potential impacts to paleontological resources to a less than significant level.

Significance Determination: Less than significant with mitigation incorporated.
Mitigation Measures: MM BIO-1, MM CUL-1, MM PAL-1, and MM TCR-1, as listed previously.
Significance Determination After Mitigation: Less than significant impact.

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

(a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.

(b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

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

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

As discussed in Section 8, *Greenhouse Gas Emissions*, global climate change occurs as the result of

global emissions of GHGs. An individual development project does not have the potential to result in direct and significant global climate change effects in the absence of cumulative sources of GHGs. The Project's total annual GHG emissions at buildout would not exceed the City's adopted GHG emissions threshold of 3,000 MTCO2e per year. As shown on Table GHG-1, the Project would result in approximately 533.2 MTCO2e per year. Therefore, the Project would not result in cumulative impacts related to GHG emissions.

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

Significance Determination: Less than significant impact.
Mitigation Measures: No mitigation measures are required.
Significance Determination After Mitigation: Less than significant impact.

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

As discussed in Section 9, *Hazards and Hazardous Materials,* soils within the Project site were determined to be contaminated with PCBs up to 25 ppm. Remediation of the soils onsite would be required to comply with the Toxic Substances Control Act threshold of 1 ppm of PCB. In addition, concentrations of shorter-chain TPH were determined to be marginally above current applicable non-cancer commercial/industrial thresholds. While significant concentrations of VOCs were not detected onsite, a VOC analysis will be conducted during excavation work. If VOC concentrations are identified, additional actions will be taken pursuant to the Soil Management Plan prepared for the Project, as included as MM HAZ-3. MM HAZ-1 through MM HAZ-4 have been included to address the PCB contamination and possible TPH contamination. These mitigation measures require the preparation of a Remedial Action Plan, Maintenance Plan, Soil Management Plan, and Health and Safety Plan which outline the proper remediation procedures to be taken before and after construction and ground-breaking activities. Therefore, with the incorporation of mitigation measures into the Project, including MM HAZ-1 through MM HAZ-4, the Project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly.

Significance Determination: Less than significant with mitigation incorporated.
Mitigation Measures: MM HAZ-1, HAZ-2, HAZ-3, HAZ-4 as listed previously.
Significance Determination After Mitigation: Less than significant impact.

Existing Plans, Programs, or Policies

As listed in previous responses.

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