



1700 E Garry Avenue Project CEQA Guidelines Section 15183 Community Plan Exemption Checklist

Lead Agency:

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20 Civic Center Plaza
Santa Ana, CA 92701

Project Applicant:

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July 2022

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1 INTRODUCTION

1.1 OVERVIEW OF CEQA GUIDELINES § 15183

This exemption analysis evaluates whether the potential environmental impacts of the proposed demolition of three office buildings, which total 103,031 square feet and construction of a new approximately 91,500 square foot light industrial warehousing building that would accommodate two tenants (proposed Project) are addressed in the *City of Santa Ana General Plan Update Final Recirculated Program Environmental Impact Report (GPU EIR)*, pursuant to the California Environmental Quality Act (CEQA) Guidelines (CEQA Guidelines) Section 15183 (Exemption Checklist).

As set forth in California Public Resources Code (PRC) Section 21083.3 and State CEQA Guidelines Section 15183, projects that are “consistent with the development density established by the existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site” (State CEQA Guidelines Section 15183(a) and PRC Section 21083.3(b)). The State CEQA Guidelines further state that “[i]f an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards [...] then an additional EIR need not be prepared for the project solely on the basis of that impact” (State CEQA Guidelines Section 15183(c)).”

1.2 GENERAL PLAN UPDATE

The City of Santa Ana (City) General Plan Update (GPU) was adopted, and the GPU EIR certified, in April 2022 (State Clearinghouse Number 2020029087); the GPU went into effect on May 26, 2022. The GPU provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana community through 2045, and provides a comprehensive land use, housing, circulation and infrastructure, public service, resource conservation and public safety policies for the entire City. The updated General Plan Land Use Element guides growth and development (e.g., infill development, redevelopment, use and revitalization/restoration) within the plan area by designating land uses.

Any decision by the City affecting land use and development must be consistent with the GPU. Any action, program, or project is considered consistent with the GPU if, considering all its aspects, it will further the objectives and policies of the GPU or not obstruct their attainment. The GPU EIR evaluates the potential environmental effects associated with implementation of the GPU and addresses appropriate and feasible mitigation measures that would minimize or eliminate these impacts.

A project is consistent with the GPU if the development density does not exceed what was contemplated and analyzed for the parcel(s) in the certified GPU EIR and complies with the associated standards applicable to that development density (State CEQA Guidelines Section 15183(i)(2)). Development density standards can include the number of dwelling units per acre, the number of people in a given area, floor area ratio (FAR), and other measures of building intensity, building height, size limitations, and use restrictions.

1.3 APPLICABILITY OF STATE CEQA GUIDELINES SECTION 15183

As set forth in State CEQA Guidelines Section 15183(d), the exemption applies to projects which meet the following conditions:

1. The project is consistent with:
 - a. A community plan adopted as part of a general plan,
 - b. A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or
 - c. A general plan of a local agency, and
2. An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

Furthermore, the exemption applies when all feasible mitigation measures identified in the applicable general plan are implemented by the public agency with jurisdiction to require such mitigation measures (State CEQA Guidelines Section 15183(e)).

The GPU EIR was certified in 2022, which analyzed the impacts of the City's GPU, which was adopted. As discussed in this exemption checklist, the Project is consistent with the development standards analyzed in the GPU EIR. The Project site is located within the GPU 55 Freeway / Dyer Road Focus Area. The General Plan (Land Use Element Page 54) describes that this focus area will transition from a portion of the city that is almost exclusively focused on professional office jobs to one that supports a range of commercial, industrial/flex, and mixed-use development.

The Project site has a GPU designation of FLEX-3 that allows a FAR of 3.0 and building heights up to 10-stories. The FLEX-3 designation allows for clean industrial uses that do not produce significant air pollutants, noise, or other nuisances typically associated with industrial uses, including office-industrial flex spaces, small-scale clean manufacturing, research, and development.

The GPU identifies (on Table LU-A-1) that the Interim Development Standard for the FLEX-3 area is M1 (Light Industrial). The M1 zone provides for a variety of light industrial uses, including warehousing, manufacture, assembly, machine shops, wholesale businesses. The M1 zone provides requirements for minimum lot sizes or 12,000 square feet with 100 feet of street frontage, building height (a maximum of 35 feet), setback requirements from public streets, landscaping requirements. The M-1 zone does not have density requirements. The Project would result in a FAR of 0.42, which is within the projections of the GPU EIR, which evaluated a density of 3.0 FAR on the site. As such, the GPU EIR adequately anticipated and analyzed the impacts of this Project, identified applicable mitigation measures necessary to reduce impacts of the Project, and the Project implements the applicable mitigation measures. The Project, therefore, qualifies for an exemption from additional environmental review as set forth in State CEQA Guidelines Section 15183.

Specifically, the Project qualifies for the exemption because the following findings can be made:

1. **The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.** The Project would result in a FAR of 0.42, which is less than the maximum FAR of 3.0 allowable in the FLEX-3 designated area, which is the development density established by the GPU and analyzed in the GPU EIR. The Project site has an Interim Development Standard of M-1 (light Industrial zone). The M-1 zone does not have density requirements.
2. **There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR failed to analyze as significant effects.** The subject property is similar to other properties in the area, including its land use designation and zoning. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the Exemption Checklist below, Project impacts were adequately analyzed by the GPU EIR; and as detailed in the GPU EIR, development projects pursuant to the GPU, such as the proposed Project could result in potentially significant impacts to air quality, cultural resources, paleontological resources, noise, and tribal cultural resources. However, applicable mitigation measures specified within the GPU EIR would reduce potential impacts to a less than significant level.

3. **There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.** The Project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the GPU. The GPU EIR considered the incremental impacts of the Project, and as explained further in the Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.
4. **There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.** As explained in the Exemption Checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.
5. **The Project will undertake feasible mitigation measures specified in the GPU EIR.** As explained in the Exemption Checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through Project design, compliance with regulations and ordinances, and through the Project's conditions of approval.

2 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The proposed Project is located at 1700 - 1740 East Garry Avenue (Assessor's Parcel Number 430-171-07), within the southeastern portion of the City of Santa Ana. The City of Irvine boundaries are located to the south of the site, across the right-of-way for Alton Avenue. The site is located within the Tustin USGS 7.5-minute quadrangle map. The location of the Project site is shown on Figure 1, *Regional Location* and Figure 2, *Local Vicinity*.

Regional access to the Project site is provided State Route 55 (SR-55) and the Dyer Road interchange. Local access is provided by Dyer Road to Pullman Street, which turns into Garry Avenue. Alternatively, local access to the site is provided by Red Hill Avenue to Alton Parkway and Daimler Street to Garry Avenue; or Red Hill Avenue to Deere Avenue to either Daimler or Pullman Streets to Garry Avenue.

2.2 EXISTING PROJECT SITE

The Project site consists of one 5.2-gross-acre parcel (see Figure 2, *Local Vicinity*). The Project site is currently developed with three office buildings, which total 103,031 square feet and were constructed between 1972 and 1974. The existing office structures are one-story cement and stucco buildings with windows that are surrounded by parking. The buildings currently accommodate multiple tenants each. Vehicular access to the Project site is provided from a driveway at Garry Avenue. See Figure 3, *Aerial View*.

The Project site has an elevation of approximately 47 feet above mean sea level with a decreasing topographic gradient to the east-northeast.

2.3 EXISTING LAND USE AND ZONING DESIGNATION OF THE PROJECT SITE

The City’s GPU designates the land use of the Project site as FLEX-3 that allows a FAR of 3.0 and building heights up to 10-stories. The FLEX-3 designation allows for clean industrial uses that do not produce significant air pollutants, noise, or other nuisances typically associated with industrial uses, including office-industrial flex spaces, small-scale clean manufacturing, research, and development.

The GPU identifies (on Table LU-A-1) that the Interim Development Standard for the FLEX-3 area is M1 (Light Industrial). The M1 zone provides for a variety of light industrial uses, including warehousing, manufacture, assembly, machine shops, wholesale businesses. The M1 zone provides requirements for minimum lot sizes or 12,000 square feet with 100 feet of street frontage, building height (a maximum of 35 feet), setback requirements from public streets, landscaping requirements. The M-1 zone does not have density requirements.

2.4 SURROUNDING LAND USES, GENERAL PLAN, AND ZONING DESIGNATIONS

The Project site is located within a developed area. The surrounding land uses, and their respective designations and zoning or interim development standard (until the zoning is updated to be consistent with the recently adopted General Plan land uses) are listed on Table 1.

Table 1: Surrounding Existing Land Use and Zoning / Interim Development Standard

	Existing Land Use	General Plan Designation	Zoning / Interim Development Standard
North	SR-55 and Commercial Offices	FLEX-3	M-1 – Light Industrial
West	SR-55 followed by Commercial and Industrial uses	FLEX-3	M-1 – Light Industrial
South	Vacant Parcel and Commercial/Industrial	FLEX-3 – Industrial/Flex & Urban and Industrial (City of Irvine)	M-1 – Light Industrial & 5.1 – Irvine Business Complex (IBC) Multi-Use (City of Irvine)
East	Commercial, Industrial, and Offices	FLEX-3 – Industrial/Flex	M-1 – Light Industrial

Figure 1: Regional Location

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Figure 2: Local Vicinity

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Figure 3: Aerial View

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Figure 4: General Plan Designation

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3 PROJECT DESCRIPTION

3.1 Project Overview

The Project includes demolition of the three existing office buildings, which are located at 1700 East Garry Avenue, 1720 East Garry Avenue, and 1740 East Garry Avenue, totaling 103,031 square feet and construction of a new approximately 91,500 square foot light industrial warehousing building that would accommodate two tenants. One side of the building would have 42,700 square feet of warehouse space and 2,500 square feet of office and mezzanine space and the other would have 46,800 square feet of warehouse space and 2,500 square feet of office and mezzanine space. Each side of the building have 5 dock doors. The site plan is illustrated on Figure 6, *Conceptual Site Plan*.

Architectural Design

The building incorporates a modern warehouse architectural design. The building exterior would be constructed with tilt-up concrete wall panels consisting of a primarily off-white color palette, with accented wall panels of light and dark grays and green. The building would be approximately 43 feet 6 inches tall with varying roof lines to break up the perception of massing. Windows would be fitted with tinted light blue glass. Building entrances would include metal canopies on the exterior of the building. The elevations and conceptual rendering of the building are illustrated on Figure 7, *Proposed Elevations*, and Figure 8, *Conceptual Rendering*.

Landscaping and Fencing

Landscaping is proposed along the entire site perimeter, adjacent to the proposed building, and throughout the parking areas. Along the Garry Avenue frontage, layered landscaping consisting of 24 and 36-inch box street trees, shrubs and assorted ground cover is proposed. The landscaping palette includes assorted drought tolerant ornamental trees, shrubs, and groundcover ranging from moderate to low water needs. Tree species include London Plane Tree, Swan Hill Fruitless Olive, Brisbane Box, and African Sumac and would be consistent with the Municipal Code 33-185, *Street Tree Species to Be Planted*, requirements. The landscape plan is illustrated on Figure 9, *Conceptual Landscape Plan*.

A 10-foot-high decorative screen wall is proposed along the southwest property line. A 9-foot-high tube steel screen fence is proposed along the southeast property line, and a 10-foot-high landscape buffer is proposed along the northwest property line adjacent to the SR-55.

Lighting

The Project would include new exterior lighting for security, to accent the landscaping, and to light signage, walkways, and parking areas that would be consistent with Municipal Code Sections 41-611.1 and 41-1304. Light pole fixtures are proposed in parking areas and wall-mounted light fixtures are proposed on the exterior of the building, and landscape accent lighting is proposed at the Project driveways. The new lighting would be focused on the site, shielded away from offsite areas.

Access and Circulation

Vehicular access to the Project site would be provided from two driveways from Garry Avenue near the northeast and southwest boundaries of the Project site. Onsite circulation includes a 30-foot-wide half-loop drive aisle that goes around the building, connecting to both proposed driveways. This drive aisle would provide vehicular access to the parking areas and loading docks in the rear of the building and would serve as the onsite fire lane where parking would be prohibited. Access to the loading dock area would be restricted via swinging tube steel gates.

A sidewalk would be installed along the Garry Avenue site frontage and accessible pedestrian paths of travel to the two building entrances from the sidewalk would be provided near the proposed driveways.

Parking and Loading Docks

Truck loading docks would be located along the south side of the building. The building would include 10 loading dock doors, five loading docks for each tenant. The Project would also 139 standard car parking stalls with 4 accessible, and 2 van accessible spaces that would be located on the northwest and southeast sides of the proposed building. Stalls near the two building entrances would be reserved for clean air vehicles and electrical vehicles in conformance with requirements set forth in CALGreen Building Code Section 5.106.5.

Infrastructure Connections

Water and Sewer. The Project would install new water and sewer lines that would connect to the existing 8-inch water main and 9-inch sewer main in Garry Avenue. In addition, an 8-inch fire water line is proposed underneath the entire length of the onsite drive aisle that would connect the existing 8-inch water main in Garry Avenue.

Drainage. The Project would install a new onsite drainage system that would connect to the existing 18-inch drain in Daimler Street. The onsite drainage would convey runoff to biofiltration basins that would treat flows prior to discharge.

Off-Site Improvements

The Project would remove the existing curb cut for the existing driveway and include two new curb cuts for the two proposed driveways within the Gary Avenue right-of-way. The Project also includes the installation of a new sidewalk along within the Gary Avenue right-of-way along the site frontage.

3.2 General Plan and Zoning

As discussed above, the GPU's land use designation of the Project site is FLEX-3 with an Interim Development Standard of M-1. The existing land use designation and Interim Development Standard allow for offices, light industrial, and other warehouse uses such as manufacturing, distribution, and assembly. As is further analyzed in this Community Plan Exemption Checklist, the Project is consistent with the existing land use designation and Interim Development Standard, and no changes to these designations are required or proposed.

3.3 Operational Characteristics

For purposes of this evaluation, the proposed building is assumed to be operational 24 hours a day, 7 days a week, with exterior loading dock area and parking areas illuminated at night. The building is designed such that business operations would be conducted within the building, except for traffic movement, parking, and the loading and unloading of trucks at designated dock doors.

3.4 Construction and Phasing

Construction activities include demolition and removal of the existing structures, landscaping, and pavement; site preparation; excavation and grading; building construction; paving; and architectural coating. Over-excavation and re-compaction of the site soils would extend at least 7.5 and 3 feet below finished or existing grade (whichever is deeper) within building and pavement/flatwork areas, respectively.

Construction activities are anticipated to last approximately 12 months, with the entire Project constructed in one phase. Project construction would occur within the hours allowed by the City's Noise Ordinance, which limits construction noise to between the hours of 7:00 A.M. and 8:00 P.M. Monday through Saturday. Construction activities are prohibited at any time on Sunday or a federal holiday (City of Santa Ana Municipal Code, Section 18-314(e)).

3.5 Prior Environmental Document(s) for Analyzing State CEQA Guidelines Section 15183

- City of Santa Ana GPU Final Recirculated Draft Program Environmental Impact Report, certified April 19, 2022. State Clearinghouse Number 2020029087.

3.6 Location of Prior Environmental Document(s)

- City of Santa Ana Planning Division Counter, 20 Civic Center Plaza, M-20, Santa Ana, CA 92701; and accessible online at the City's website: <https://www.santa-ana.org/general-plan-environmental-documents/>

3.7 Discretionary Approvals

In accordance with State CEQA Guidelines Sections 15050 and 15367, the City is the designated Lead Agency for the Project and has principal authority and jurisdiction for CEQA actions and Project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed Project and/or mitigation. Trustee Agencies are state agencies that have jurisdiction by law over natural resources affected by a proposed Project. There are no Responsible Agencies or Trustee Agencies, or any other public agencies, whose approval is required for approving this Project.

The following discretionary actions are anticipated to be necessary for implementation of the Project:

City of Santa Ana

- Amendment Application (zone change) to update the site's zoning designation to change from Professional (P) to Light Industrial (M-1) to be consistent with the FLEX-3 General Plan land use designation and the M-1 interim development standard for FLEX-3, and
- Conditional Use Permit (CUP), to allow a freight, bus, and truck terminal for distribution activities, as defined by Santa Ana Municipal Code (SAMC) Section 41-60 and permitted by SAMC Section 41-472.5(i).

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Figure 5: Conceptual Site Plan

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Figure 6: Proposed Elevations

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Figure 7: Conceptual Rendering

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Figure 8: Conceptual Landscape Plan

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4 ENVIRONMENTAL CHECKLIST

4.1 CHECKLIST FORM

Project Title: Garry Avenue Business Park Project
Lead Agency Name and Address: City of Santa Ana, 20 Civic Center Plaza, M-20, Santa Ana, CA 92701
Contact Person and Phone Number: Ali Pezeshkpour, AICP. Principal Planner, 714-647-5882
Project Location: 1700 - 1740 East Garry Avenue, Santa Ana, Ca 92705 (APN: 430-171-07)
Project Sponsor's Name and Address: Greenlaw Management Inc., 18301 Von Karman Avenue, Suite 300, Irvine, CA 92612
General Plan Designation: FLEX-3
Zoning/ Interim Development Standard: Light Industrial (M-1)
Project Description: Redevelopment of a 5.2-acre parcel currently developed with three commercial industrial buildings that total 103,031 square feet with a new 91,500 square foot light industrial building that would accommodate two tenants. One side would consist of a 42,700 square feet of warehouse space and 2,500 square feet of office and mezzanine space and the other would have 46,800 square feet of warehouse space and 2,500 square feet of office and mezzanine space. Each side of the building have 5 dock doors. See Section 3, above, for additional details about the proposed Project.
Surrounding Land Uses and Setting: The Project site is located within a developed area, including the SR-55 along the northwest side of the site, and commercial, light industrial, and office/business park uses, and roadways surrounding the other sides of the site.
Other Public Agencies Whose Approval is Required: Not Applicable.
<p>Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?</p> <p>Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California tribes as part of the CEQA process and equates significant impacts on "tribal cultural resources" with significant environmental impacts (PRC Section 21084.2). AB 52 requires that lead agencies undertaking CEQA review evaluate, just as they do for other historical and archeological resources, a project's potential impact to a tribal cultural resource. In addition, AB 52 requires that lead agencies, upon request of a California Native American tribe, begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. AB 52 does not apply to a Notice of Exemption or Addendum, such as this Community Plan Exemption Checklist (State CEQA Guidelines Section 15183). As such, AB 52 consultation is not required for this Project.</p>

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

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

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

On the basis of this initial evaluation:

<input checked="" type="checkbox"/>	I find that the proposed project WOULD NOT result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time the prior EIR. NO FURTHER ACTION is required, and a Notice of Determination (Section 15094) will be filed indicating that the project IS ELIGIBLE for an EXEMPTION under State CEQA Guidelines Section 15183.
<input type="checkbox"/>	I find that the proposed Project would result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time the prior EIR. I find that FURTHER ENVIRONMENTAL REVIEW is necessary to analyze those effects that are subject to CEQA, and therefore, this Project is NOT ELIGIBLE for an EXEMPTION under State CEQA Guidelines Section 15183.

Signature

Date

Printed Name

Title

EVALUATION OF ENVIRONMENTAL IMPACTS

This Community Plan Exemption Checklist provides an analysis of potential environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G Checklist, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under State CEQA Guidelines Section 15183.

- Items checked “Peculiar Impact that is not Substantially Mitigated” indicates that the Project could result in a peculiar impact, including a physical change that belongs exclusively or especially to the project or that is a distinctive characteristic of the project or the project site and that peculiar impact is not substantially mitigated by the imposition of uniformly applied development policies or standards. (State CEQA Guidelines Section 15183(b)(1)(f))
- Items checked “Impact not Analyzed as Significant Effect in GPU EIR” indicates that the project could result in a significant effect that was not analyzed as significant in the GPU EIR. Such a project impact is not significant if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (State CEQA Guidelines Section 15183(b)(2),(c),(f))
- Items checked “Potentially Significant Offsite or Cumulative Impact Not Discussed in GPU EIR” indicates the project could result in a significant offsite or cumulative impact that was not discussed in the GPU EIR. Such an offsite or cumulative project impact is not significant if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (State CEQA Guidelines Section 15183(b)(3),(c),(f))
- Items checked “Adverse Impact More Severe Based on Substantial New Information” indicates that there is new information that leads to a determination that a project impact is more severe than discussed in the GPU EIR. Such an impact is not more severe if it can be substantially mitigated by the imposition of uniformly applied development policies or standards. (State CEQA Guidelines Section 15183(b)(4),(c),(f)).
- Items checked “No New Impact” indicates that potential impacts from the project have been adequately analyzed in the GPU EIR.

A project does not qualify for a Community Plan Exemption if it is determined that it would result in one or more of the following: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR, 2) a significant impact was not analyzed as significant in the GPU EIR, 3) a potentially significant offsite impact or cumulative impact not discussed in the GPU EIR, or 4) a more severe impact due to substantial new information that was not known at the time the GPU EIR was certified. However, if a project having any of the foregoing impacts can be substantially mitigated through the imposition of uniformly applied development policies or standards. Uniformly applied development policies or standards that are applicable to the proposed project are included within this analysis.

A summary of the City’s analysis of each potential environmental effect is provided in the checklist below for each CEQA subject area.

5 ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist. The section briefly summarizes the conclusions of the GPU EIR, and then discuss whether or not the proposed Project is consistent with the findings contained in the GPU EIR, or if further analysis is required pursuant to CEQA. Mitigation measures referenced herein are from the GPU EIR.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.1 AESTHETICS. Except as provided in Public Resources Code Section 21099 would the project:

a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed aesthetics impacts on pages 5.1-20 through 5.1-32. The GPU EIR describes that buildout under the GPU would be at a greater intensity/density in all five focus areas compared to existing conditions. While maximum height would generally be similar to existing buildings, the overall increase in allowed intensity and height across the focus areas would lead to a visually denser urban setting and alter Santa Ana’s existing skyline. However, the EIR determined that buildout under the GPU would not have a substantial adverse effect on scenic vistas (such as the Santa Ana River and Santiago Creek) since these existing open space parcels would remain unchanged. Additionally, no state scenic highways, eligible or officially designated, traverse the city nor are located near the city. Therefore, the GPU would not damage scenic resources, including rock outcroppings, trees, and historic buildings within state scenic highways. The EIR also determined that the GPU would create new sources of light or glare, but adverse impacts would be minimized with compliance to building codes.

Impacts Associated with the Proposed Project

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

No New Impact.

The GPU EIR describes that the 55 Freeway/Dyer Street focus area (that the Project site is located in) is not along a scenic corridor, but it is located in close proximity to a major City entry. The GPU EIR describes that the FLEX land use designation in the area allows for an urban environment with a mix of uses instead of an area that is almost exclusively focused on professional office and industrial. The GPU EIR further identifies that the Scenic Corridors Element identifies selected views of the City from SR-55 and that development consistent with the GPU, would enhance views of the City from SR-55. As the proposed Project would redevelop that site with a new modern one-story building, consistent with the GPU land use designation, it would not result in an impact related to a scenic vista. As detailed in Figure 5, Conceptual Site Plan, the proposed building would be setback from the roadway; and therefore, would not encroach into existing views along the Garry Avenue or SR-55 roadway corridors. Thus, the Project would result in no new impact related to effects on a scenic vista.

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

No New Impact. The California State Scenic Highway System Map shows that there are no officially designated state scenic highways in the vicinity of the proposed Project. The only officially designated scenic highway within Orange County is a portion of SR-91 that is located between SR-55 to east of the Anaheim city limit, which is not in the vicinity of the Project site. Likewise, there are no County-designated scenic highways that run through the City of Santa Ana. Further, the proposed Project site is flat and surrounded by an urban built environment, and there are no other scenic resources, including trees, rock outcroppings, or historic buildings within the viewshed of the Project. Therefore, no new impacts related to scenic resources within a state scenic highway would occur.

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

No New Impact. The Project is in an urbanized area. The Project proposes to demolish the existing three office buildings and to construct a new approximately 91,500 square foot light industrial building that would accommodate two tenants. The proposed building would be developed in compliance with the FLEX-3 land use designation and M-1 (Light Industrial) Interim Development Standard as shown in Table AES-1 below.

Table AES-1: Project Consistency with GPU and Municipal Code Standards

Development Feature	Development Standard	Project Consistency
GPU Standards for FLEX-3		
FAR	3.0	The Project would have a FAR of 0.43
Building Height	Maximum of 10 stories	The proposed building would be a maximum height of 43 feet 6 inches which is less than the 10-story maximum.
Municipal Code Standards for the M-1 Interim Development Standard		
Building Height	May exceed the standard 35-foot limit set forth in the M-1 zoning	The proposed buildings would be a maximum height of 43 ft and 6 inches.

Development Feature	Development Standard	Project Consistency
	district as the project site is located in a height-exempt area.	
Lot Size	Minimum of 12,000 SF	The Project site is 5.2 acres
Street Frontage	Minimum of 100 ft	
Landscaping	<p>A yard is required along any lot line which abuts a public street which in shall be of an area not less than the length of such lot line in feet multiplied by:</p> <p>(i) Twenty (20) feet, if the street is designated in the general plan of the city as an arterial street; or</p> <p>(ii) Ten (10) feet, if the street is not so designated as an arterial street.</p> <p>The yard required by paragraph (a) shall include a strip immediately adjacent to the street and shall be of a width not less than:</p> <p>(i) Ten (10) feet, if the street is designated in the general plan of the city as an arterial street; or</p> <p>(ii) Five (5) feet, if the street is not so designated as an arterial street.</p>	The Project would include a 26-foot landscaped setback from Gary Avenue.
Wall Height	Walls and fences shall not exceed 10 ft in height and shall not exceed 4 ft in height where the wall or fence extends into the required front yard or landscaped area	A 10-foot-high decorative screen wall is proposed along the southwest property line. A 9-foot-high tube steel screen fence is proposed along the southeast property line, and a 10-foot-high landscape buffer is proposed along the northwest property line adjacent to SR-55.

Visual character and quality of the proposed industrial building would be similar to the existing building, but with aesthetic improvements, such as new architectural treatments, new landscaping, lighting, etc. Therefore, the Project would be consistent with regulations governing scenic quality of the Project site. As described previously, the GPU EIR determined that development consistent with the GPU, would enhance views of the City from SR-55. As the proposed Project would redevelop that site that is adjacent to SR-55 with a new modern one-story building, consistent with the GPU land use designation, it would not result in an impact related to visual character or quality. Furthermore, the Project would not conflict with an applicable zoning or other regulation governing scenic quality. Therefore, and no new impacts would occur.

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

No New Impact. The Project site is located within a developed urban area, adjacent to highly used roadways. Existing sources of light in the vicinity of the Project site includes: vehicle lights from SR-55, streetlights along Garry Avenue, parking lot lighting, building illumination, security lighting, landscape

lighting, and lighting from building interiors that pass-through windows. The exterior lighting on the Project site includes exterior lighting throughout the parking areas and lighting at buildings entrances.

The proposed Project would include the provision of nighttime lighting for security purposes around all of the building and parking areas. Implementation of the proposed Project would result in a similar intensity development on the site than currently exists, which would contribute similar sources of light to the overall ambient nighttime lighting conditions. Also, all outdoor lighting would be hooded, appropriately angled away from adjacent land uses, and would comply with the Santa Ana Municipal Code Section 41-611.1 and Section 41-1304 that provides specifications for shielding lighting away from adjacent uses and intensity of security lighting. Because the Project area is within an urban area with various sources of existing nighttime lighting, and the Project would be required to comply with the City's lighting regulations that would be verified by the City's Planning and Building Agency during the permitting process, the lighting increase in light that would be generated by the Project would not adversely affect day or nighttime views in the area. Overall, no new lighting impacts would occur from the Project.

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. Generally, darker, or mirrored glass would have a higher visible light reflectance than clear glass. Buildings constructed of highly reflective materials from which the sun reflects at a low angle can cause adverse glare. The proposed Project would not use highly reflective surfaces, and the proposed building would not be glass sided. Although the proposed building would contain windows, the windows would be separated by stucco and architectural treatments, which would limit the potential of glare. In addition, as described previously, onsite lighting would be angled down and shielded, which would avoid the potential on onsite lighting to generate glare. Therefore, the Project would not generate substantial sources of glare, and no new impacts would occur.

Conclusion

With regards to the issue area of aesthetics, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures

None are applicable to the Project.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.2 AGRICULTURE AND FORESTRY

RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed agriculture and forestry resource impacts on pages 8-1 and 8-2. The GPU EIR determined that the City does not have any significant agricultural resources and has no land designated or zoned for agricultural use and does not have any land subject to a Williamson Act contract. Santa Ana does not have any land designated or zoned for forestland, timberland, or zoned Timberland Production. Thus, the GPU EIR concluded that impacts associated with conversion of farmland and forestry would not occur, and no mitigation measures related to agricultural, or forestry were required or identified.

Impacts Associated with the Proposed Project

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

No New Impact. The Project site is on Urban and Built-Up Land according to the California Department of Conservation’s California Important Farmland Finder Map. The Project site is surrounded by Urban and Built-Up Land. No farmland or other agricultural uses are located near the Project site. Therefore, the Project would result in no new impacts related to farmland or agriculture.

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

No New Impact. As identified above, the Project site does not include agricultural land. The Project site has a General Plan land use of FLEX-3 land use and an Interim Development Standard of M1 (Light Industrial). Additionally, the Project site is not currently under an active Williamson Act contract. Therefore, the Project would result in no new impacts on conflicts 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))?**

No New Impact. As discussed above, the Project site is currently developed and located within an urban and developed area. The Project site does not include forest land or timberland. The Project site is designated as FLEX-3 and has an Interim Development Standard of M1. Therefore, the Project would result in no new impacts related to conflicts with existing forest land or timberland zoning.

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

No New Impact. As discussed above, the Project site is currently developed and located within an urban and developed area. The Project site does not include forest land or timberland. Therefore, the Project would result in no new impacts related to conversion of forest land to non-forest use.

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

No New Impact. As identified above, the Project site does not include agricultural land. The site is developed and is not used for agricultural purposes. The site is not designated or zoned for forest land. The proposed Project would not convert farmland to a nonagricultural use or convert forest land to a non-forest use. Therefore, no impacts would occur, and the Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the Project would result in no new impacts related to conversion of agricultural or forest land to non-agricultural or non-forest use.

Conclusion

With regards to the issue area of agricultural/forestry resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.3 AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed air quality impacts on pages 5.2-45 through 5.2-72. The GPU EIR determined that the GPU is inconsistent with the South Coast Air Quality Management Plan (AQMP) because buildout under the GPU would exceed the population estimates assumed for the AQMP and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB). Air pollutant emissions associated with buildout of the GPU would cumulatively contribute to the nonattainment designations in the SoCAB. The EIR included Mitigation Measure AQ-2; however, due to the magnitude and scale of the land uses that would be developed, no mitigation measures are available that would reduce operation and construction impacts below South Coast AQMD thresholds. Therefore, the GPU determined that impacts related to the AQMP, and air quality emissions would remain significant and unavoidable.

The GPU EIR also determined that construction activities associated with buildout of the GPU could generate short-term emissions that exceed the South Coast AQMD’S significance thresholds during this time and cumulatively contribute to the nonattainment designations of the SoCAB. Implementation of Mitigation Measure AQ-1 would reduce criteria air pollutant emissions from construction-related activities to the extent feasible. However, the EIR determined that construction time frames and equipment for site-specific development projects have a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. Thus, impacts were determined to be significant and unavoidable.

The GPU EIR also determined that because existing sensitive receptors may be close to project-related construction activities and large emitters of on-site operation-related criteria air pollutant emissions, construction and operation emissions generated by individual development projects have the potential to exceed South Coast AQMD's Local Significance Thresholds (LSTs). The EIR describes that Mitigation Measures AQ-1 and AQ-2 would reduce the regional construction and operation emissions associated with buildout of the GPU and therefore also result in a reduction of localized construction- and operation-related criteria air pollutant emissions, to the extent feasible. However, even with the implementation of these mitigation measures, impacts would remain significant and unavoidable.

The GP EIR also describes that buildout of the GPU could expose sensitive receptors to substantial concentrations of toxic air contaminants (TAC). Mitigation Measure AQ-3 was included to ensure mobile sources of TACs not covered under South Coast AQMD permits are considered during subsequent, project-level environmental review by the City of Santa Ana. The EIR describes that individual development projects would be required to meet the incremental risk thresholds established by South Coast AQMD, with implementation of Mitigation Measure AQ-3, and TACs would be less than significant a project level but would result in a cumulative contribution to health risk that is significant and unavoidable. The GPU EIR determined that the GPU Industrial and Industrial Flex land uses are not anticipated to produce odors, and Mitigation Measure AQ-4 would ensure that odor impacts are minimized, and facilities would comply with South Coast AQMD Rule 402.

Impacts Associated with the Proposed Project

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

No New Impact. The Project site is located in the South Coast Air Basin and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the SCAG are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. Criteria for determining consistency with the AQMP are defined in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). A project is considered consistent with the AQMP if it would not result in or cause California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) violations. In addition, 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.

Furthermore, The South Coast Air Basin (SCAB) is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. Should construction or operation of the proposed Project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

The Project proposes to demolish the existing three buildings, which total 103,031 square feet and to construct a new approximately 91,500 square foot industrial building that would accommodate two tenants with 5 dock doors for each tenant. Of the 91,500 square feet, 81,500 square feet would be used for warehouse facility and 10,000 square feet would be used for office space.

The GPU and GPU EIR assumed that the Project site would be developed with the FLEX-3 designation that allows for clean industrial uses. The Project is consistent with the development assumptions for Project site in the GPU EIR, and the land use designations of the GPU are consistent with the 2016 AQMP. As detailed in Response b), the CalEEMod modeling prepared for the proposed Project determined that construction and operation of the Project would not exceed SCAQMD thresholds, including the CAQQS and NAAQS. The proposed Project is therefore considered to be consistent with the current 2016 AQMP. Therefore, the Project would result in no new impacts related to conflict with implementation of an 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)?

No New Impact. SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NO_x, SO_x, PM₁₀, and PM_{2.5}) that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The methodologies from the SCAQMD CEQA Air Quality Handbook are used in evaluating Project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table AQ-1.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs./day)	Operations (lbs./day)
NO _x	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SO _x	150	150
CO	550	550
Lead	3	3

Source: Air Quality Assessment (Appendix A)

Construction

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

It is mandatory for all construction Projects to comply SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM₁₀, 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 Project 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 Rules 403 and 1113 were accounted for in the construction emissions modeling. As shown in Table AQ-2, construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Further, the Project’s contribution to cumulative levels of any criteria pollutant would not be cumulatively considerable and would be less than significant.

Table AQ-2 Maximum Peak Construction Emissions

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO ₂)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
Construction Year 1	3.96	40.82	24.00	0.07	20.91	11.53
Construction Year 2	45.41	17.55	19.85	0.04	2.05	1.11
SCAQMD Threshold	75	100	550	150	150	55
Exceed SCAQMD Threshold?	No	No	No	No	No	No

Source: Air Quality Assessment (Appendix A)

Operation

Operational activities associated with the Project would result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, mobile source emissions, and on-site equipment emissions. Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. Operational vehicular emissions would generate a majority of the emissions from implementation of the Project.

Operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table AQ-3. As shown, the proposed Project would result in long-term regional emissions of criteria pollutants, however, these emissions would be below the SCAQMD’s applicable thresholds. Therefore, the Project’s operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

Table AQ-3: Proposed Project Operational Emissions

Source	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO ₂)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Summer Emissions						
Area Source Emissions	2.11	0.00	0.02	0.00	0.00	0.00
Energy Emissions	0.01	0.10	0.08	0.00	0.00	0.00
Mobile Emissions	0.52	6.65	6.34	0.04	2.80	0.81
Off-road Emissions	1.97	16.47	15.95	0.04	0.85	0.78
Total Emissions	4.61	23.22	22.39	0.08	3.65	1.59
SCAQMD Threshold	55	55	550	150	55	150
Exceeds Threshold?	No	No	No	No	No	No
Winter Emissions						
Area Source Emissions	2.10	0.00	0.02	0.00	0.00	0.00
Energy Emissions	0.01	0.10	0.08	0.00	0.00	0.00
Mobile Emissions	0.53	6.92	6.08	0.04	2.80	0.81
Off-road Emissions	1.97	16.47	15.95	0.04	0.85	0.78
Total Emissions	4.61	23.49	22.13	0.08	3.65	1.59
SCAQMD Threshold	55	55	550	150	55	150
Exceeds Threshold?	No	No	No	No	No	No

Source: Air Quality Assessment (Appendix A)

b) Expose sensitive receptors to substantial pollutant concentrations?

No New Impact. The daily construction emissions generated onsite by the proposed Project are evaluated against SCAQMD’s Localized Significance Thresholds (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as “sensitive

receptors”; they are also known to be locations where an individual can remain for 24 hours. The nearest residential receptor is located approximately 2,200 feet north of the Project site. In addition, it is noted that a dialysis center is 700 feet to the northeast.

Daily construction emissions generated onsite by the proposed Project are evaluated against SCAQMD’s screening look-up tables for LSTs that have been interpolated for a 2.5-acre site as the proposed construction would disturb a maximum of 2.5 acres per day during grading activities. The appropriate Source Receptor Area (SRA) for the LST analysis is Central Orange County (SRA 17).

Although the nearest residence is approximately 2,200 feet from the Project, the Air Quality Assessment provides a conservative analysis of potential LST impacts at the dialysis center, 700 feet (213 meters) from the site is provided to identify maximum potential impacts. As shown in Table AQ-4, emissions resulting from Project construction would not exceed thresholds of significance established by the SCAQMD for any criteria pollutant.

Table AQ-4: Project Localized Significance Summary of Construction

Construction Activity	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Particulate Matter (PM ₁₀)	Particulate Matter (PM _{2.5})
Demolition (2021)	31.44	21.57	11.72	2.98
Site Preparation (2021)	40.50	21.15	20.91	11.53
Grading (2021)	24.74	15.86	7.89	4.32
Building Construction (2021)	17.43	16.58	0.96	0.90
Building Construction (2022)	15.62	16.36	0.81	0.76
Paving (2022)	11.12	14.58	0.57	0.52
Architectural Coating (2022)	1.41	1.81	0.08	0.08
<i>Maximum Daily Emissions</i>	40.50	21.57	20.91	11.53
SCAQMD Localized Screening Threshold (adjusted for 2.5 acres at 213 meters)	159	3,119	76	29
Exceed SCAQMD Threshold?	No	No	No	No

Source: Air Quality Assessment (Appendix A)

Table AQ-5 identifies the localized operational impacts at the nearest receptor location in the vicinity of the Project. As shown in Table AQ-5, emissions resulting from Project operations would not exceed thresholds of significance established by the SCAQMD for any criteria pollutant. Therefore, the Project would result in no new impact related to exposure of sensitive receptors to substantial pollutant concentrations.

Table AQ-5: Project Localized Significance Summary of Operations

Activity	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Particulate Matter (PM ₁₀)	Particulate Matter (PM _{2.5})
On-Site Emissions (Area, Energy, and Off-road Equipment Sources)	16.57	16.05	0.85	0.78
SCAQMD Localized Significance Threshold (5 acres at 213 meters)	204	4,248	23	8
Exceed SCAQMD Threshold?	No	No	No	No

Source: Air Quality Assessment (Appendix A)

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

No New Impact. The proposed Project does not include heavy industrial, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding, or other land uses that typically result in emissions associated with odor complaints, based on the SCAQMD CEQA Air Quality Handbook. The Project would provide for warehousing. Potential emissions that may lead to odors during construction activities include equipment exhaust. However, these emissions and any associated odors would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Therefore, development pursuant to the proposed Project would not result in any substantial impacts related to odor. The Project would result in no new impacts on other emissions affecting a substantial number of people.

Conclusion

With regards to the issue area of air quality, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

AQMD Rule 402. The construction plans shall include a note that 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.

AQMD Rule 403. The construction plans shall include a note that 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.

AQMD Rule 1113. The construction plans shall include a note that 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.

GPU EIR Mitigation Measures Applicable to the Project

AQ-1 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are

determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Require fugitive-dust control measures that exceed South Coast AQMD's Rule 403, such as:
 - Use of nontoxic soil stabilizers to reduce wind erosion.
 - Apply water every four hours to active soil-disturbing activities.
- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower
- Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast AQMD's website.

Proposed Project Applicability: Mitigation Measure AQ-1 is applicable to the proposed Project and an Air Quality Assessment has been completed and provided in Appendix A.

AQ-2 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that require refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in for the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).
- Provide changing/shower facilities as specified in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures).
- Provide bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures)

of the CALGreen Code.

- Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures).
- Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code.
- Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building & Safety during plan check.
- Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate.

Proposed Project Applicability: Mitigation Measure AQ-2 is applicable to the proposed Project and an Air Quality Assessment has been completed and provided in Appendix A.

AQ-3 Prior to discretionary approval by the City of Santa Ana, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel- powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Santa Ana for review and approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District and shall include all applicable stationary and mobile/area source emissions generated by the proposed project at the project site. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceed the respective thresholds, as established by the South Coast AQMD at the time a project is considered (i.e., 10 in one million cancer risk and 1 hazard index), the project applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling on-site, electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Proposed Project Applicability: Mitigation Measure AQ-3 is not applicable to the proposed Project because it would only generate 44 truck trips per day, as detailed in Section 5.17, Transportation.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
5.4 BIOLOGICAL RESOURCES.					
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed biological resource impacts on pages 5.3-17 through 5.3-22. The GPU EIR describes that the parcels within the 55 Freeway/Dyer Road focus area, which includes the Project site, have a land use designation of Professional and Administrative Office that would change to Industrial/Flex under the GPU. The vegetation community observed within these parcels is classified as "ruderal", which is not native nor considered to be a sensitive vegetation community. Since the existing vegetation communities are not sensitive and non-native, the GPU EIR determined that no impact would occur. The GPU EIR also determined that Development pursuant to the GPU would not impact riparian habitat or other sensitive natural communities. Additionally, the GPU would not impact wetlands and jurisdictional waterways. However, the GPU EIR includes mitigation that requires biological review of project sites that include vegetated land or streams. The GPU would not conflict with an adopted NCCP/HCP as the City is not within a NCCP/HCP area and would not conflict with local policies or ordinances protecting biological resources. The EIR also describes that impacts from buildout of the GPU to nesting sites and migratory birds would be less than significance with compliance with the Migratory Bird Treaty Act as well as state law.

Impacts Associated with the Proposed Project

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

No New Impact. The Project site is fully developed with office buildings and associated uses. Additionally, the Project site is not identified within an area of special-status wildlife species. The Biological Assessment (Appendix B) describes that there are no native habitats on the Project site and no wetlands or waters of the U.S., RWQCB, or CDFW exist onsite. No special-status plant or wildlife species were identified and there is no potential for special-status species to occur onsite due to the lack of native habitat, lack of aquatic features, and the high level of development on-site and in the surrounding area. Therefore, the Project would result in no new impacts on any species identified as a candidate, sensitive, or special status species.

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

No New Impact. As discussed above, the Project site is fully developed with urban uses. The Biological Assessment (Appendix B) describes that there are no native habitats on the Project site and no riparian habitat exist onsite or in the surrounding area. Therefore, the Project would result in no new impacts to riparian habitat or other sensitive natural community.

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

No New Impact. As discussed above, the Project site is fully developed and does not include wetlands. Therefore, the Project would result in no new impacts to wetlands.

- 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?**

No New Impact. As discussed above, the Project site is fully developed with three office buildings and the site is surrounded by urban development, including a freeway and commercial and light industrial development. The Project site does not contain established native resident or migratory wildlife corridors and is not used as a native wildlife nursery site. The Project site includes ornamental trees that would be

removed as part of the Project. Tree removal and/or indirect impacts from construction activity during nesting season (February 1 to August 31) could result in the disturbance of nesting migratory species covered under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503. However, compliance with these existing regulations, as ensure through the City's development permitting process, the Project would not result in new impacts on migratory fish or wildlife species.

e) Conflict with any local policies or ordinances protecting biological resources?

No New Impact. The City of Santa Ana Municipal Code Chapter 33, Regulation of the Planting, Maintenance, and Removal of Trees, establishes regulations and standards related to public trees and street trees. The Project would install street trees along Garry Avenue that would be ensured to be in compliance with City regulations through the City's development permitting process. Therefore, the Project would result in no new impacts on local policies or ordinance protecting biological resources.

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

No New Impact. The Project site is outside of the Significant Ecological Areas (SEAs) identified in the GPU EIR. There are no other Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans that apply to the Project site. Therefore, the Project would result in no new impacts on habitat conservation plans.

Conclusion

With regards to the issue area of biological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

Compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503.

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.5 CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed cultural resource impacts on pages 5.4-26 through 5.4-31.

Historic Resources. The GPU EIR described that certain development pursuant to the GPU may not be able to avoid impacts to historical resources. Mitigation Measures CUL-1 and CUL-2 would reduce most impacts to a less than significant level. However, if significant impacts cannot be avoided, the City shall require, at a minimum, that the affected historical resources are documented consistent with Mitigation Measure CUL-3. The GPR EIR determined that unavoidable impacts to historical resources resulting from future development under the GPU would be reduced to the maximum extent feasible but would still be significant with implementation of Mitigation Measure CUL-3.

Archaeological Resources. The GPU EIR discussed that development involving ground disturbance has the potential to impact known and unknown archaeological resources, and details that eight archaeological resources have been recorded within the City, including four prehistoric sites, one multicomponent site, and three historic isolates. The City includes locations may have been used for prehistoric Native American occupation, and buried resources may remain. The EIR determined that there is a moderate likelihood that intact subsurface archaeological resources would be encountered during redevelopment. Therefore, EIR mitigation requires that Phase I Cultural Resources studies be completed before ground disturbances and demolition activities are permitted to occur. The GPU EIR included Mitigation Measures CUL-4 through CUL-7 to reduce potential individual and cumulative impacts associated with future development and redevelopment. Mitigation Measure CUL-4 requires an archaeological resources assessment be conducted for future development projects to identify any known archaeological resources and sensitivity of the site. Mitigation Measures CUL-5 through CUL-7 detail the next steps required should the archaeological resources assessment identify known resources or determine the site to have high or moderate resource sensitivity. The EIR determined that upon compliance with Mitigation Measures CUL-4 through CUL-7, individual and cumulative impacts to archaeological resources would be reduced to less than significant levels.

Human Remains. The EIR determined that the likelihood that human remains may be discovered during clearing and grading activities is considered extremely low. In the unlikely event human remains are

uncovered, impacts would be less than significant upon compliance with California and Safety Code Section 7050.5

Impacts Associated with the Proposed Project

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

No New Impact. CEQA defines a historical resource as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and CEQA Guidelines Section 15064.5[a]).

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

The Project site is currently developed with three office buildings, which are 34,000 square feet (1700 East Garry Avenue), 18,000 square feet (1720 East Garry Avenue), and 19,000 square feet (1740 East Garry Avenue) and were constructed between 1972 and 1974. The existing office structures are modern one-story cement and stucco buildings with windows that are surrounded by parking. The buildings are currently between 48 and 50 years in age and were not identified as historic structures in the GPU, and no historic resources are located adjacent to the site.

The Phase I Environmental Site Assessment historical research identified that prior to development of the existing buildings, the site and surrounding areas were used for row crops. City directories confirm the site has since been occupied by various commercial office tenants that include: printers, carpet cleaners, roofers, and office uses, which are not historically significant.

A Historic Resources Assessment was prepared for the project site (Appendix C), which determined that the existing buildings on the Project site do not qualify for designation under the Local Register or the CRHR. The Project site and buildings do not exhibit features that would distinguish them architecturally or artistically, nor are they the work of a notable architect, builder, or designer under CRHR 3 / Local Register 1, 2, 3. No specific information was identified to indicate that the property exemplifies or represents a special element of Santa Ana's history or is connected with a business or use that was once common but is now rare under CRHR 1 and 2 / Local Register 4 and 6. Also, the Historic Resources Assessment determined that the Project site is unlikely to yield information important to an archaeological site under CRHR 4 / Local Register 5. Therefore, the Project would not result in a new impact related to an adverse change in the significance of a historic resource.

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

No New Impact. As described in the GPU EIR, eight archaeological resources have been recorded within the City, including four prehistoric sites, one multicomponent site, and three historic isolates, which were likely found in close proximity to the Santa Ana River. As required by General Plan EIR Mitigation Measure CUL-4, an Archaeological Resources Assessment has been prepared and is included in Appendix D. The

Archaeological Resources Assessment describes that the Project site has been previously disturbed by grading, and fill soil was identified in soils tests to a depth of five to seven feet. The Archaeological Resources Assessment determined that based upon the previous grading disturbance of the site and the sparse number of recorded archaeological sites in the vicinity, the Project site has a very low potential to contain buried and in situ cultural resources. Thus, the Archaeological Resources Assessment determined that it is highly unlikely that any resources would be impacted by redevelopment of the site.

Based on the very low potential of the site for archaeological resources, the Project would not be required to implement GPU Mitigation Measures (listed below) related to archeological monitoring. Therefore, the Project would result in no new impacts related to adverse change in the significance of an archaeological resource.

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

No New Impact. The Project site does not contain a cemetery, and no known formal cemeteries are located within the immediate vicinity of the Project site. Nevertheless, should human remains be unearthed during grading and excavation activities associated with Project development, the construction contractor would be required by California law to comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.98(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

Through mandatory compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, the Project would not result in significant impacts to human remains, and impacts would be less than significant. Therefore, the Project would result in no new impact related to disturbance of human remains.

Conclusion

With regards to the issue area of cultural/archeological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

California Health and Safety Code Section 7050.5 regarding human remains

GPU EIR Mitigation Measures Applicable to the Project

CUL-1 Identification of Historical Resources and Potential Project Impacts. For structures 45 years or older, a Historical Resources Assessment (HRA) shall be prepared by an architectural historian

or historian meeting the Secretary of the Interior's Professional Qualification Standards. The HRA shall include: definition of a study area or area of potential effect, which will encompass the affected property and may include surrounding properties or historic district(s); an intensive level survey of the study area to identify and evaluate under federal, State, and local criteria significance historical resources that might be directly or indirectly affected by the proposed project; and an assessment of project impacts. The HRA shall satisfy federal and State guidelines for the identification, evaluation, and recordation of historical resources. An HRA is not required if an existing historic resources survey and evaluation of the property is available; however, if the existing survey and evaluation is more than five years old, it shall be updated.

Proposed Project Applicability: Mitigation Measure CUL-1 is applicable to the proposed Project as the onsite buildings were developed between 1972 and 1974 and are a minimum of 48 years old. A Historic Resources Assessment was prepared and is included as Appendix C.

CUL-2 Use of the Secretary of the Interior's Standards. The Secretary of the Interior's Standards for the Treatment of Historic Properties shall be used to the maximum extent practicable to ensure that projects involving the relocation, conversion, rehabilitation, or alteration of a historical resource and its setting or related new construction will not impair the significance of the historical resource. Use of the Standards shall be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualification Standards. Evidence of compliance with the Standards shall be provided to the City in the form of a report identifying and photographing character-defining features and spaces and specifying how the proposed treatment of character-defining features and spaces and related construction activities will conform to the Standards. The Qualified Professional shall monitor the construction and provide a report to the City at the conclusion of the project. Use of the Secretary's Standards shall reduce the project impacts on historical resources to less than significant.

Proposed Project Applicability: Mitigation Measure CUL-2 is not applicable to the proposed Project because the Project does not involve relocation, conversion, rehabilitation, or alteration of a historical resource.

CUL-3 Documentation, Education, and Memorialization. If the City determines that significant impacts to historical resources cannot be avoided, the City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits and may also require additional public education efforts and/or memorialization of the historical resource. Though demolition or alteration of a historical resource such that its significance is materially impaired cannot be mitigated to a less than significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian, historian, or historic architect meeting the Secretary of the Interior's Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; archival photographic documentation; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as the Santa Ana Library History Room, the South Central Coastal Information Center at California State University, Fullerton, and/or the HABS collection housed in the Library of Congress. Depending on the significance of the adversely affected historical resource, the City, at its discretion, may also require public education about the historical resource in the form of an exhibit, web page, brochure, or other format and/or memorialization of the historical resource on or near the proposed project site. If memorialized, such memorialization shall be a permanent installation, such as a mural, display, or other vehicle that recalls the location, appearance, and

historical significance of the affected historical resource, and shall be designed in conjunction with a qualified architectural historian, historian, or historic architect.

Proposed Project Applicability: Mitigation Measure CUL-3 is not applicable to the proposed Project because the Project does not involve impacts to a historical resource.

CUL-4 For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards in either prehistoric or historic archaeology.

Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.

Proposed Project Applicability: Mitigation Measure CUL-4 is applicable to the proposed Project and an Archaeological Resources Assessment has been prepared and is included in Appendix D.

CUL-5 If potentially significant archaeological resources are identified, and impacts cannot be avoided, a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior’s Standards to determine significance prior to any ground-disturbing activities. If resources are determined significant or unique through Phase II testing, and site avoidance is not possible, appropriate site-specific mitigation measures shall be undertaken. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the Office of Historical Preservation’s “Archaeological Resource Management Reports (ARMR): Recommended Contents and Format” (OHP 1990) and “Guidelines for Archaeological Research Designs” (OHP 1991).

Proposed Project Applicability: Mitigation Measure CUL-5 is applicable to the proposed Project and will be included in the Project MMRP.

CUL-6 If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist and a Native American monitor approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated with the project area shall monitor all ground-disturbing construction and pre-construction activities in areas of high sensitivity. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project’s initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. The Native American monitor shall be invited to participate in this training. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary’s Standards. This will include tribal consultation and coordination with the Native American monitor in the case of a prehistoric archaeological resource or tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation

with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

Proposed Project Applicability: Mitigation Measure CUL-6 is not applicable to the proposed Project because the site has been determined to have very low sensitivity for archaeological resources.

CUL-7 If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary's Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.

Proposed Project Applicability: Mitigation Measure CUL-7 is not applicable to the proposed Project because the site has been determined to have very low sensitivity for archaeological resources

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.6 ENERGY. Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed energy impacts on pages 5.5-15 through 5.5-20. The GPU EIR determined that implementation of the GPU policies, in conjunction with and complementary to regulatory requirements, would ensure that energy demand associated with growth under the GPU would not be inefficient, wasteful, or unnecessary. Additionally, the GPU would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impacts Associated with the Proposed Project

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

No New Impact.

Construction

During construction of the proposed project would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the project site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities related to the proposed development and the associated infrastructure is not expected to result in demand for fuel greater on a per-development basis than other development projects in Southern California. Diesel fuel would be supplied by existing commercial fuel providers serving the Project site and region¹.

Construction of the Project would result in fuel and electricity consumption from the use of construction tools and equipment, vendor and haul truck trips, and vehicle trips generated from construction workers traveling to and from the site. There are no unusual project characteristics that would cause the use of construction

¹ Based on Appendix A of the CalEEMod User's Guide, Construction consists of several types of off-road equipment. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod assumes all of the equipment operates on diesel fuel.

equipment that would be less energy efficient compared with other similar construction sites in other parts of the State. Therefore, construction-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and there would be no new impacts.

Operation

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc.

As previously described, the site is currently developed with three office buildings that total 103,031 square feet, and the Project would result in a smaller 91,500 square foot building, reducing the area that needs energy resources. Also, due to implementation of new technology and compliance with current Title 24 requirements, the Project would improve energy efficiency over the existing aged structures that were developed between 1972 and 1974. Thus, no wasteful, inefficient, or unnecessary consumption of energy would occur with implementation of the proposed Project.

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

No New Impact. The proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. In addition, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. The non-residential building would be solar ready would have infrastructure as required by CCR Title 24 requirements. Thus, the proposed Project would not obstruct use of renewable energy or energy efficiency. Overall, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no new impacts would occur.

Conclusion

With regards to the issue area of energy, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

Title 24 energy efficiency standards

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.7 GEOLOGY AND SOILS. Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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ii) Strong seismic ground shaking?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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iii) Seismic-related ground failure, including liquefaction?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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iv) Landslides?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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b) Result in substantial soil erosion or the loss of topsoil?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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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?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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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?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

<input type="checkbox"/>	<input checked="" type="checkbox"/>				
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Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed energy impacts on pages 5.6-20 through 5.6-24. The GPU EIR discussed that the location and underlying geology of the City make it likely to experience seismic hazards, including strong seismic ground shaking, and secondary hazards, like liquefaction. No active surface faults are mapped and zoned under the AP Zoning Act in the City and all structures that would be constructed in accordance with the GPU would be designed to meet or exceed current design standards as found in the latest CBC. Most of the City area is within an area susceptible to liquefaction; however, all structures constructed under the GPU would be designed in accordance with current seismic design standards as found in the CBC. There are no substantial hazards with respect to slope stability, as the City is mostly flat. Unstable geologic unit or soils conditions, including soil erosion, could result from development of the GPU. Mandatory compliance with existing regulations, including the preparation and submittal of a SWPPP and a soil engineering evaluation, would reduce soil erosion impacts to a less than significant level. Implementation of the CBC design code, which has been adopted by the City and requires that structures be designed to mitigate expansive and compressible soils, would reduce impacts to a less than significant level. The EIR determined that the probability of subsidence impacts is generally low in the majority of Santa Ana; however, the statutorily required sustainable groundwater management practices of the Orange County Water District would ensure that impacts would be less than significant. Also, the EIR determined that future development in the City would require connection to the City's sewer system as the City of Santa Ana does not allow for the installation of septic tanks.

The GPU EIR described that grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially disturb paleontological resources. Therefore, the GPU EIR included Mitigation Measures GEO-1 through GEO-3 prescribe requirements for monitoring based on the sensitivity of sites for paleontological resources. Under GEO-1, areas that range from high to low sensitivity are required to prepare a Paleontological Resources Monitoring and Mitigation Plan. With adherence to Mitigation Measures GEO-1 through GEO-3, impacts to paleontological resources would be less than significant.

Impacts Associated with the Proposed Project

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

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

No New Impact. The Project site is not within an Alquist Priolo fault zone and is not in an area where structures are at significant risk from fault rupture. The closest published active fault to the site is the San Joaquin Hills Fault, approximately 2 miles from the Project site. Other active faults in the vicinity of the site include the onshore extension of the Newport-Inglewood Fault Zone, approximately 5 miles southwest of the site, the Palos Verdes Fault, approximately 25 miles to the west, the Elsinore Fault, approximately 17 miles to the north. Therefore, the Project would result in no new impacts on people or structures due to rupture of an earthquake fault in the Alquist Priolo fault zone.

- ii. Strong seismic ground shaking?**

No New Impact. As discussed previously, there are a number of potentially active and active fault systems located near the Project site. As required by California Building Code (CBC) Chapter 16 for the construction of new buildings or structures, specific engineering design and construction measures would be implemented to anticipate and avoid the potential for adverse impacts to human life and property caused by seismically induced ground shaking. Compliance with CBC Chapter 16 would be verified through the City's plan check

and permitting process. Therefore, the Project would result in no new impacts on people or structures due to strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

No New Impact. The Preliminary Geotechnical Investigation (Appendix E) describes that the Project site is mapped as being located within a liquefaction zone; however, the liquefaction hazard is very low due to limited settlement potential and the general discontinuity of weaker soil layers across the site. The Preliminary Geotechnical Investigation provides CBC seismic design criteria that are specific to the onsite soils and the potential liquefaction and settlement. Compliance with the CBC would require proper construction of building footings and foundations so that it would withstand the effects of potential ground movement, including liquefaction.

Development of the proposed Project would be required to conform to the seismic design parameters of the CBC, which are reviewed by the City for as part of the building plan check and development review process. Compliance with the requirements of the CBC and City's municipal code for structural safety would provide that no new hazards from seismic-related ground failure, including liquefaction would occur.

iv. Landslides?

No New Impact. The Project site is topographically flat and is not near a hill or other area that could be vulnerable to landslides. Therefore, the Project would result in no new impacts on people or structures due to landslides.

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

No New Impact. The Project site is flat and does not contain sloped conditions that would result in conditions outside of those evaluated under the GPU EIR. The Project would demolish the existing three buildings, landscaping, and pavement, and construct a new approximately 91,500 square foot industrial building. During construction activities, soil would be exposed and there would be an increase in potential for soil erosion compared to existing conditions. Development greater than one acre in size is required to comply with the provisions of the Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB), which includes implementation of standard erosion control practices as required by a Stormwater Pollution Prevention Plan (SWPPP). The Project site is fully developed, and proposed development would not substantially change imperviousness of the site, resulting in impacts to stormwater runoff velocity or volume. Therefore, the Project would result in no new impacts in 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

No New Impact. As discussed above, the Project site is not located within an area that is subject to landslides, and impacts related to landslides would not occur. Also, as described previously, the liquefaction hazard is very low due to limited settlement potential and the general discontinuity of weaker soil layers across the site. Thus, the potential for lateral spreading would also be limited. Compliance with the requirements of the CBC and City's municipal code for structural safety would provide that no new hazards related unstable geologic units or soils would occur. Appropriate design required by the CBC is reviewed by the City as part of the building plan check and development review process. Therefore, the Project would result in no new impacts in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.

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

No New Impact. The Preliminary Geotechnical Investigation describes that the onsite soils have a medium to high expansion potential. The Preliminary Geotechnical Investigation provides CBC seismic design criteria that are specific to the onsite soils and the potential for expansion. Compliance with the CBC would require proper construction of building footings and foundations so that it would withstand the effects of potential ground movement, including liquefaction. Also, the Project includes over-excavation and re-compaction of the site soils to at least 7.5 and 3 feet below finished or existing grade (whichever is deeper) within building and pavement/flatwork areas, respectively, which would be conducted pursuant to the requirements of the CBC. Compliance with the requirements of the CBC and City's municipal code for structural safety would provide that no new impacts related to expansive soils would occur.

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

No New Impact. The Project would be connected to sewer and would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would result in no new impacts on soils incapable of adequately supporting the use of septic tanks.

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

No New Impact. Although the GPU did not identify records of fossils from within the City, the Natural History Museum of Los Angeles County (LACM) has records of 16 fossil localities within a five-mile radius of the City, with the closest fossil locality approximately 2.5 miles south of the City. According to the GPU EIR, the Project site is located within an area with a low potential for paleontological resources. However, as the Project includes over-excavation and re-compaction of the site soils to at least 7.5 feet below the existing grade into potentially native soils, GPU EIR Mitigation Measure GEO-2 would be required to be implemented to reduce potential impacts consistent with the GPU EIR. Therefore, the Project would result in no new impacts that would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Conclusion

With regards to the issue area of geology and soils, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

California Building Code, as included in the City's Municipal Code as Chapter 8, Article 2, Division 1

GPU EIR Mitigation Measures Applicable to the Project

GEO-1 High Sensitivity. Projects involving ground disturbances in previously undisturbed areas mapped as having "high" paleontological sensitivity shall be monitored by a qualified paleontological monitor on a full-time basis. Monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, if the fossils are determined to be significant, professionally and efficiently recover the fossil specimens and collect associated data. The paleontological monitor shall use field data forms to record pertinent location and geologic data, measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.

Proposed Project Applicability: Mitigation Measure GEO-1 is not applicable to the proposed Project because the Project site is not located within a high paleontological sensitivity area.

GEO-2 Low-to-High Sensitivity. Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with “low-to-high” paleontological sensitivity, the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have high sensitivity, construction activity shall be monitored by a qualified paleontologist. The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.

Proposed Project Applicability: Mitigation Measure GEO-2 is applicable to the proposed Project because the Project site is located within a low paleontological sensitivity area and will be included in the MMRP for the proposed Project.

GEO-3 All Projects. In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified, and a curatorial arrangement shall be signed prior to collection of the fossils.

Proposed Project Applicability: Mitigation Measure GEO-3 is applicable to the proposed Project and will be included in the MMRP for the proposed Project.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.8 GREENHOUSE GAS EMISSIONS.

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed greenhouse gas emissions (GHG) impacts on pages 5.7-31 through 5.7-40. The GPU EIR determined that implementation of Mitigation Measure GHG-1 would ensure that the City is tracking and monitoring the City’s GHG emissions in order to chart a trajectory to achieve the long-term, year 2050, GHG reduction goal set by Executive Order S-03-05. However, at this time, there is no plan past 2030 that achieves the long-term GHG reduction goal established under Executive Order S-03-05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology. Advancements in technology in the future could provide additional reductions and allow the state and City to meet the 2050 goal, but in the meantime, the EIR determined that impacts would be significant and unavoidable. The EIR included a mitigation measure to require the City to update the Climate Action Plan every 5 years. However, this is not a project specific mitigation measure, and not directly related to development projects. The EIR determined that the GPU would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Impacts Associated with the Proposed Project

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

No New Impact. The GPU EIR describes (on page 5.7-20) that if project emissions are below the 3,000 MTCO2e bright-line screening threshold, GHG emissions impacts would be considered less than significant.

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the Project is provided in Table GHG-1, *Construction-Related Greenhouse Gas Emissions*. As shown, the Project construction would result in approximately 483 MTCO2e. Per SCAQMD methodology construction GHG emissions are amortized over 30 years, then added to the operational emissions. The amortized Project construction emissions would be 16 MTCO2e per year.

Table GHG-1: Construction-Related GHG Emissions

Category	MTCO ₂ e
Construction Year 1	274
Construction Year 2	209
Total Construction Emissions	483
30-Year Amortized Construction	16

Source: GHG Assessment (Appendix F)

Operational or long-term GHG emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in Table GHG-2, Project Greenhouse Gas Emissions, which shows that the Project would generate approximately 1,668 MTCO₂e annually from both construction and operations of the Project. As such, the Project would not exceed the 3,000 MTCO₂e bright-line screening threshold and no new impacts would occur.

Table GHG-2: Proposed Project GHG Emissions

Emissions Source	MTCO ₂ e per Year
Area	0
Energy	121
Mobile	806
Off-road	625
Waste	22
Water	78
Amortized Construction Emissions	16
Total Annual Project GHG Emissions	1,668
<i>Threshold</i>	3,000
Exceeds Threshold?	No

Source: GHG Assessment (Appendix F)

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

No New Impact. As described above, the proposed Project would implement new FLEX-3 land uses that are consistent with the GPU. The GPU EIR describes that new buildings associated with land uses accommodated under the proposed land use plan of the GPU, such as the proposed project, would be built to meet the CALGreen and Building Energy Efficiency Standards in effect at the time when applying for building permits. Thus, the developments pursuant to the GPU, such as the proposed Project would not obstruct implementation of the CARB Scoping Plan or SCAG Regional Transportation Plan.

SB 375 required SCAG to adopt a Sustainable Communities Strategy (SCS) as part of its Regional Transportation Plan (RTP). SCAG adopted the Connect SoCal Plan in May 2020. The Connect SoCal plan would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region by projecting development that is generally consistent with regional-level

general plan data and implementing transportation projects. The GPU includes the following goals and policies to support the GHG reduction:

- **Conservation Element, Goal 3:** Reduce consumption of and reliance on non-renewable energy to support the development and use of renewable energy sources (Policies 3.3 and 3.11).
- **Land Use Element, Goal 4:** Support a sustainable Santa Ana through improvements to the built environment and a culture of collaboration (Policy 4.5).

In addition, as discussed in Table 5.7-7 of the GPU, the GPU EIR found the GPU to be consistent with applicable policies from the SCAG Connect SoCal RTP/SCS. SCAG RTP/SCS policies and strategies that were evaluated include:

- Focus growth near destinations and mobility options
- Promote Diverse Housing Choices
- Support Implementation of Sustainable Policies

The Project would not conflict with identified SCAG Connect SoCal RTP/SCS Goals and strategies. Additionally, Section 5.11, Land Use and Planning, include policies from the GPU that are pertinent to the Project. The Project was found to be consistent with all applicable policies. Therefore, the Project would result in no new impacts related to conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Consistency with the Santa Ana CAP. The City of Santa Ana has an adopted a Climate Action Plan (CAP). For community-wide emissions, the CAP reduction goal is 15% below the baseline year 2008 by 2020, and 30% below the baseline year 2008 by 2035. The CAP includes community-wide measures that are collectively estimated to reduce emissions by 47,909 MTCO_{2e}/year by 2035. The CAP recommends several measures that would achieve GHG reductions including installation of solar photovoltaic systems and compliance with Title 24 energy efficiency standards.

In support of these measures the Project would be implemented pursuant to the CALGreen Building (Title 24). The City's administration of the Title 24 requirements includes review of proposed energy conservation measures during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include increased insulation; use of energy and water efficient appliances; water efficient plumbing and fixtures; Low-E windows, high performance; heating, ventilation and air conditioning equipment (HVAC); and more. In addition, the non-residential building would be solar ready would have infrastructure as required by Title 24 requirements. In complying with the Title 24 standards, the Project would be implementing regulations that reduce GHG emissions. Thus, the Project would not obstruct the City of Santa Ana CAP GHG reduction and would therefore not result in a new impact.

Conclusion

With regards to the issue area of greenhouse gas emissions, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

Title 24 energy efficiency standards

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.9 HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed energy impacts on pages 5.8-36 through 5.8-46. The GPU EIR discussed that construction and operations under the GPU would involve the transport, use, and/or disposal of hazardous materials; however, compliance with existing regulations would ensure that construction workers and the general public are not exposed to any risks related to hazardous materials during demolition and construction. Furthermore, the EIR describes that strict adherence to all emergency response plan requirements set by the Orange County Fire Authority would be required. The GPU buildout is expected

to result in some increase in the number of hazardous waste generators; however, the EIR determined that hazardous wastes would be stored, transported, and disposed of in conformance with existing regulations of the EPA, US Department of Transportation, CalRecycle, and other agencies. Use, storage, transport, and disposal of hazardous materials in conformance with regulations would reduce both the likelihood of an accidental release and the potential consequences in the event of an accidental release.

The EIR describes that the City includes sites on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 that could create a significant hazard to the public or the environment. Any development, redevelopment, or reuse on or next to any of these sites would require environmental site assessment by a qualified environmental professional to ensure that the project would not disturb hazardous materials on any of the hazardous materials sites or plumes of hazardous materials diffusing from one of the hazardous materials sites, and that any proposed development, redevelopment, or reuse would not create a substantial hazard to the public or the environment.

The EIR also describes that Santa Ana is in the vicinity of an airport or within the jurisdiction of an airport land use plan. Projects approved under the proposed GPU would be required to comply with FAA airspace protection regulations using the AELUP consistency determination process.

The EIR determined that buildout of the GPU would not result in substantial changes to the circulation patterns or emergency access routes and would not block or otherwise interfere with use of evacuation routes. Buildout would not interfere with operation of the City's Emergency Operations Center and would not interfere with operations of emergency response agencies or with coordination and cooperation between such agencies.

Santa Ana is not in a designated fire hazard zone, and the EIR determined that implementation of the GPU would not expose structures and/or residences to wildland fire danger.

Impacts Associated with the Proposed Project

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

No New Impact.

Construction. Project construction would require demolition of an existing buildings that were developed between 1972 and 1974 and construction of a new light industrial building, which would require grading activity. Buildings constructed in or before 1981 are presumed to contain asbestos containing materials, such as, floor tile/mastic, wall stucco, insulation, and roof mastic. An asbestos survey of the existing building would be conducted prior to demolition, as required by City permitting. Federal and state regulations govern the renovation and demolition of structures where materials containing asbestos are present. These requirements include: SCAQMD Rules and Regulations pertaining to asbestos abatement (including Rule 1403), Construction Safety Orders 1529 from Title 8 of the California Code of Regulations, Part 61, and Subpart M of the Code of Federal Regulations. Asbestos abatement must be performed and monitored by contractors with appropriate certifications from the State Department of Health Services. In addition, California Division of Occupational Safety and Health (Cal/OSHA) has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces the hazard communication program regulations, which include provisions for identifying and labeling hazardous materials, describing the hazards of chemicals, and documenting employee-training programs. All demolition that could result in the release of asbestos must be conducted according to Cal/OSHA standards. Adherence to existing regulations, which require appropriate testing and abatement actions for hazardous materials, would minimize exposure to asbestos during construction activities.

Proposed construction activities would also involve the routine transport, use, and disposal of other hazardous materials such as paints, solvents, oils, grease, and other construction-related materials. In addition,

hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state regulations that are implemented by the City of Santa Ana during building permitting for construction activities. As a result, no new impacts related to hazardous material impacts during construction would occur.

Operation

Operation of the proposed Project includes activities related to a speculative light industrial building. Although the Project would likely utilize common types of hazardous materials, normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment or workers within or in the vicinity of the Project. Per the GPU EIR, both the federal and state governments require all businesses that handle more than a specified volume of hazardous materials to submit a business plan to a regulating agency. Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted; and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The plans and permits are reviewed by the Fire Department and Building and Safety Departments, as part of project permitting procedures. Therefore, the Project would result in no new impacts related to the routine transport, use, or disposal of hazardous materials.

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

No New Impact.

Construction

The Project includes the demolition of an existing buildings and construction of a new, slightly larger light industrial building. A Phase I Environmental Site Assessment was conducted for the Project to assess potential hazardous impacts, included as Appendix H. The assessment identified no evidence of recognized environmental conditions on the site. The only identified issues concern groundwater contamination from offsite sources. As detailed in the Project Description, the Project is anticipated to excavate to approximately 7.5 feet below the existing grade. The Preliminary Geotechnical Investigation (Appendix E) identified groundwater at 12 feet below grade and the depth to high groundwater is 10 feet below grade. Thus, construction of the Project is not anticipated to encounter contaminated groundwater. However, should groundwater be encountered, existing Regional Water Quality Control Board (RWQCB) measures would be implemented through the City's typical construction permitting process.

To further avoid an impact related to an accidental release of hazardous materials into the environment, the use of best management practices (BMPs) during construction would be implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit. Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and 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.

Operation

The Project would include operation of a speculative light industrial building. As discussed above, operational use of hazardous materials on the Project site would be subject to federal, state, and local requirements that

aim to avoid and minimize the potential release of hazardous substances. The Orange County Fire Authority (OCFA) is contracted with the City of Santa Ana and would inspect the facility to ensure compliance with proper handling measures identified in the hazardous materials disclosure report and emergency response plan. Therefore, the Project would result in no new impacts related to the accidental upset or release of hazardous materials.

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

No New Impact. The Project site is not located within the vicinity of a school. The site is located within a commercial and industrial area. As described in the previous responses, Project construction and operation would involve the use and disposal of various hazardous materials. However, all storage, handling, use, and disposal of these materials are regulated by federal state regulations that are implemented by the City. While the Project would involve the use and disposal of various hazardous materials, compliance with federal and state regulations would reduce impacts to a less than significant level and impacts would be consistent with the GPU EIR. Therefore, the Project would result in no new impacts related to hazardous emissions within one-quarter mile of a school.

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

No New Impact. The Phase I Environmental Site Assessment (Appendix H) included database searches to determine if the Project area or any nearby properties are identified as currently having hazardous materials. The record searches determined that the Project site is not located on or near by a site which is included on a list of hazardous materials sites pursuant to Government Code Section 65962.5. Therefore, the Project would not result a new impact related to hazardous materials sites compiled pursuant to Government Code Section 65962.5.

e) For a project 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 for people residing or working in the project area?

No New Impact. The Project would not expose people residing or working in the Project site to a safety hazard related to an airport. The nearest airport is John Wayne Airport that is located approximately 1.5 miles south of the Project site. The Project site is located outside of the safety zones of the airport. Therefore, the Project would result in no new impact related to airport safety hazards.

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

No New Impact. The Project would include demolition of the existing three office buildings and construction of a new light industrial building. The Project would not result in roadway closure, or other activities that could impact emergency response or evacuation. During short-term construction activities, the proposed Project is not anticipated to result in any substantial traffic queuing on nearby streets, and all construction equipment would be staged within the Project site. During the operational phase of the proposed Project, onsite access would be required to comply with standards established by the City. The proposed Project would provide adequate emergency access to the site via Garry Avenue. Therefore, the Project would result in no new impact related to impairment of 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?

No New Impact. According to CAL FIRE, the nearest fire hazard severity zone (FHSZ) is approximately 4.0 miles east of the City along the western edge of Loma Ridge, and about 3.8 miles away from the City at the southern tip of the Peters Canyon Regional Park. According to the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP) Fire Hazard Severity Zones map, the Project is not within an area identified as a fire hazard safety zone (FHSZ). Therefore, the Project would result in no new impacts related to exposure of people or structures to significant risk involving wildland fires.

Conclusion

With regards to the issue area of hazards and hazardous materials, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

NPDES Stormwater Pollution Prevention Plan.

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.10 HYDROLOGY AND WATER

QUALITY. Would the project:

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

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

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

i) result in substantial erosion or siltation on- or off-site;

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

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

iv) impede or redirect flood flows?

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

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

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed hydrology and water quality impacts on pages 5.9-29 through 5.9-38. The GPU EIR discussed that projects pursuant to the GPU would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Development pursuant to the GPU would increase the demand on groundwater use but would not impede sustainable groundwater management of the basin. Development pursuant to the GPU would increase the amount of pervious surfaces in the plan area, but could substantially increase the rate or amount of surface runoff in some focus areas in a manner which would result in flooding off-site or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. In flood hazard, tsunami, or seiche zones, development pursuant to the GPU would not risk release of pollutants due to project inundation or impede or redirect flood flows. In addition, the EIR determined that development pursuant to the GPU would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impacts Associated with the Proposed Project**a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?****No New Impact.****Construction**

Implementation of the proposed Project includes grading, site preparation, construction of new building, and infrastructure improvements. These activities would expose and loosen sediment and building materials, which would have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality. Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, the use of BMPs during construction implemented as part of a SWPPP as required by the National Pollution Discharge Elimination System (NPDES) General Construction Permit (and Municipal Code Section 18-156) would ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Furthermore, an Erosion and Sediment Transport Control Plan prepared by a qualified SWPPP developer (QSD) is required to be included in the SWPPP for the Project. Therefore, compliance with the Statewide General Construction Activity Stormwater Permit requirements, and the City's Municipal Code, which would be verified during the City's construction permitting process, would ensure that Project impacts related to construction activities resulting in a degradation of water quality would not occur.

Operation

The proposed Project would operate an industrial warehouse, which would introduce the potential for pollutants such as, chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles and trucks. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, the on-site runoff will be collected into catch basins with filter inserts that are located throughout the site, drain into the underground storm drain system. Proposed development is compliant with the requirements set by the Orange County Drainage Area Management Plan (DAMP) and the RWQCB hydrology and LID standards, as described in the Preliminary Hydrology and Hydraulics Study and Preliminary Water Quality Management Plan (Appendix I and Appendix J) that were prepared for the Project. The LID site design would minimize impervious surfaces and provide infiltration and treatment of the site's runoff. Therefore, the Project would result in no new impact on water quality standards or waste discharge requirements.

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

No New Impact. Groundwater recharge is facilitated by percolation of stormwater through pervious surface areas to groundwater resources. Increasing the imperviousness of an area could interfere with groundwater recharge capabilities of a given landscape. The Project site is currently developed, and the Preliminary Water Quality Management Plan identified that it is 85 percent covered with impervious surfaces. The Project proposes to demolish the existing 3 buildings and pavement and construct a new 91,500 square foot light industrial building. The Preliminary Water Quality Management Plan identifies that after Project construction, the site would also be 85 percent impervious. Thus, an increase of impervious surface and reduction of groundwater recharge would not occur from the Project. Also, the Project would be required to comply with Orange County DAMP permit by employing BMPs for on-site detention/retention of stormwater runoff. Therefore, the Project would not substantially interfere with groundwater recharge.

Additionally, water to the Project site would be provided by City of Santa Ana that is dependent on surface water imported by the Metropolitan Water District of Southern California (MWD) from the Colorado River and Northern California and the Orange County Water District that manages the Orange County Groundwater Basin. Further, the change of the site from three office buildings to one light industrial warehouse building would not generate an increased demand for groundwater. Therefore, the Project would not result new impacts on groundwater supplies or recharge.

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 substantially increase the rate or amount of surface runoff in a manner which would:**i. Result in substantial erosion or siltation on- or off-site?**

No New Impact. As discussed above, construction related to implementation of the proposed Project would expose and loosen building materials and sediment which has the potential to mix with stormwater runoff and result in erosion or siltation offsite. However, as described previously, a SWPPP (required by Municipal Code Section 18-156) would be developed for the Project. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. SWPPP implementation would include monitoring by a Qualified SWPPP Practitioner (QSP) throughout Project construction to ensure site compliance with the SWPPP and CGP requirements.

The Project site would be redeveloped with a light industrial building, parking, and landscaping. Post construction conditions would not include exposed soils and would not be susceptible to substantial erosion. LID would be incorporated into Project site design in compliance with the WQMP that would capture and treat stormwater runoff on site. Therefore, the Project would result in no new impact

ii. **Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?**

No New Impact. Implementation of the proposed Project would include construction activities that could temporarily alter the existing drainage pattern of the site and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of the proposed construction requires a SWPPP, which would address site specific drainage issues related to construction activities and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities.

The Project site is currently developed, and the Preliminary Water Quality Management Plan identified that it is 85 percent covered with impervious surfaces. The Project proposes to demolish the existing 3 buildings and pavement and construct a new 91,500 square foot light industrial building. The Preliminary Water Quality Management Plan identifies that after Project construction, the site would also be 85 percent impervious. Thus, an increase of impervious surface that could result in flooding would not occur. Also, the Project includes installation of a drainage system that would be required to meet the Orange County DAMP requirements, as ensured through Project permitting, and would connect to the existing offsite drainage. Therefore, the Project would not result in new impact related to flooding on- or off-site.

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

No New Impact. As described in the previous response, the Project site is currently developed, and the Preliminary Water Quality Management Plan (Appendix J) identified that it is 85 percent impervious. The Preliminary Water Quality Management Plan identifies that after Project construction, the site would also be 85 percent impervious. Thus, an increase of impervious surface that could generate additional runoff would not occur. Also, the Project includes installation of a drainage system that would be required to meet the Orange County DAMP requirements, as ensured through Project permitting, and would connect to the existing offsite drainage. Therefore, the Project would result in no new impact related to runoff which would exceed the capacity of existing or planned stormwater drainage systems.

iv. **Impede or redirect flood flows?**

No New Impact. The Project site does not lie within a 100- or 500- year floodplain, as delineated by FEMA. The Project site is within Zone X, Area of minimal Flood Hazard. The Project would not result in alteration of existing drainage (flows or capacity) that could directly or indirectly impact onsite drainages or the adjacent areas. Therefore, the Project would not result a new impact related to flood flows.

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

No New Impact. The Project site is not within a flood hazard zone, and flooding impacts are not anticipated.

Tsunamis are tidal waves generally caused by earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The Project site is approximately 8 miles from the Pacific Ocean shoreline. Based on the inland location of the site, the Project site is not within a tsunami zone.

A seiche is a wave created in a landlocked body of water (e.g., a lake or reservoir) from back-and-forth movement of the water resulting from high winds or an earthquake. There are no bodies of water near the Project site. Thus, impacts due to seiche would not occur. Therefore, the Project would result in no new impact related to release of pollutants due to flood hazard, tsunami, or seiche zones.

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

No New Impact. As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit would serve to ensure that Project impacts related to construction activities resulting in a degradation of water quality would not occur. Thus, construction of the Project would not conflict or obstruct implementation of a water quality control plan.

The Preliminary WQMP for the Project complies with the Orange County DAMP. The WQMP and applicable BMPs are verified as part of the City's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed Project would not conflict or obstruct with a water quality control plan.

Also, the OCWD manages basin water supply through the Basin Production Percentage, such that, the anticipated production of groundwater would remain steady, and as described previously the change of the site from three office buildings to one light industrial warehouse building would not result in increases for groundwater supplies. Therefore, the Project would be consistent with the groundwater management plan and would not conflict with or obstruct its implementation, and no new impacts would occur.

Conclusion

With regards to the issue area of hydrology and water quality, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

Municipal Code Section 18-156; Control of Urban Runoff.

GPU EIR Mitigation Measures Applicable to the Project

None.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.11 LAND USE AND PLANNING. Would the project:

- | | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed land use and planning impacts on pages 5.10-18 through 5.10-28. The GPU EIR determined that implementation of the GPU would not divide an established community. Additionally, the GPU would be consistent with the Airport Environs Land Use Plan for the John Wayne Airport. Implementation of the GPU would be consistent with the goals of the Southern California Association of Governments’ RTP/SCS. Implementation of the GPU would also be consistent with the OCTA Congestion Management Plan.

Impacts Associated with the Proposed Project

a) Physically divide an established community?

No New Impact. The Project would demolish three existing office buildings and construct a new approximately 91,500 square foot light industrial building. The proposed Project would be consistent with the existing land use and zoning designations and would not introduce roadways or other infrastructure improvements that would bisect or transect the Project site or surrounding area. Therefore, the Project would result in no new impact related to dividing an established community.

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

No New Impact.

The Project site has a GPU designation of FLEX-3. The Project would result in a FAR of 0.42, which is less than the maximum FAR of 3.0 allowable in the FLEX-3 designated area. As described in the GPU Land Use Element, the FLEX-3 designation allows for office/industrial flex spaces (such as the Project), R&D, clean manufacturing, and corporate headquarters. The GPU states that adjacent to the 55 freeway, the Industrial/Flex land use designation will promote large-scale office/industrial flex spaces, multilevel corporate offices, and research and development uses in beautiful and creative buildings and spaces. The proposed Project would be consistent with the FLEX-3 land use designation and with the 55 Freeway and Dyer Road Focus Areas, as evaluated in the GPU EIR. Therefore, the Project would not result in a new impact

related to conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Conclusion

With regards to the issue area of land use and planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

None.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.12 MINERAL RESOURCES. Would the project:

- | | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed mineral resource impacts on pages 5.11-6 through 5.11-7. The GPU EIR determined that the GPU buildout would not result in the loss of availability of a known mineral resource.

Impacts Associated with the Proposed Project

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

No New Impact. The California Department of Conservation does not designate the city as being within a Significant Mineral Aggregate Resource Area (SMARA), nor is it located in an area with active mineral extraction activities. The GPU and GPU EIR also did not identify mineral resources within the City, including the Project site. Therefore, the Project would result in no new impact related to loss of availability of a known mineral resource.

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

No New Impact. The GPU does not include any designated areas of locally important mineral resource recovery. Therefore, the Project would result in no new impact related to locally important mineral resources.

Conclusion

With regards to the issue area of mineral resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.13 NOISE. Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed noise impacts on pages 5.12-29 through 5.12-50.

Construction Noise. The GPU EIR described that Mitigation Measure N-1 would reduce potential noise impacts during construction to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, construction noise could result in a temporary substantial increase in noise levels above ambient conditions. Therefore, impacts would remain significant and unavoidable.

Operational Noise. The GPU EIR determined that buildout of the GPU would cause a substantial traffic noise increase on local roadways and could locate sensitive receptors in areas that exceed established noise standards and that Mitigation Measure N-2 would reduce potential interior noise impacts to future noise-sensitive receptors below the thresholds. However, there are no feasible or practical mitigation measures available to reduce project-generated traffic noise to less than significant levels for existing residences along affected roadways. Thus, the GPU EIR determined that traffic noise would remain a significant and unavoidable impact.

Construction Vibration Impacts. The GPU EIR discussed that construction activity would generate varying degrees of ground vibration, depending on the construction procedures and equipment, that has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 inches per second [in/sec] PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). The EIR determined that implementation of Mitigation Measure N-2 and adherence to associated performance standards, would reduce impacts to a less-than-significant level.

Operational Vibration Impacts. The GPU EIR discussed that commercial and industrial operations would generate varying degrees of ground vibration, depending on the operational procedures and equipment. The EIR determined that with implementation of Mitigation Measures N-3 and N-4 and adherence to associated performance standards, impacts would be reduced to less-than-significant. Mitigation Measures N-3 and N-4 would reduce potential vibration impacts from commercial/industrial uses and proposed uses near existing railroads and facilities to less-than-significant levels.

The GPU EIR determined that buildout of the GPU would not result in exposure of future residents and/or workers to excessive airport-related noise.

Impacts Associated with the Proposed Project

- a) **Generation of 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?**

No New Impact.

General Plan Noise Standards

The GPU includes standards related to excessive noise levels. The City’s General Plan noise standards for noise-sensitive land uses are provided in Table N-1.

Table N-1: City of Santa Ana Noise Element Standards

Land Use Category	Sensitive Land Use	Noise Level (dBA CNEL)	
		Interior	Exterior
Residential	Single-family, duplex, multi family	45	65
Institutional	Hospital, school classroom/playgrounds, church, library	45	65
Open Space	Parks	--	65

Source: City of Santa Ana Noise Element

City of Santa Ana Municipal Code

Pursuant to the City’s Municipal Code Section 18-313, noise levels at residential properties are restricted from exceeding certain noise levels for extended periods of time. Table 5.10-3 provides the Municipal Code exterior noise standards that are applied to residential properties.

Table N-2: City of Santa Ana Municipal Code Residential Noise Standards

Time	Permissible Noise Levels (dBA)				
	L ₅₀	L ₂₅	L ₈	L ₂	L _{max}
10:00 p.m. to 7:00 a.m.	50	55	60	65	70
7:00 a.m. to 10:00 p.m.	55	60	65	70	75

Source: City of Santa Ana Municipal Code, Article VI, Section 18-312.

With respect to construction-related noise, Section 18-314 (Special Provisions) of the City’s Municipal Code specifies that noise sources associated with construction activities are exempt from the City’s established noise standards as long as the activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or any time on Sunday or a federal holiday.

Existing Noise Levels

To quantify existing ambient noise levels in the Project area, noise measurements were conducted on April 8, 2021. As shown in table N-3, existing ambient noise ranges between 62.3 and 66.5 dBA Leq.

Table N-3: Noise Measurements

Site	Location	Leq (dBA)	Lmin (dBA)	Lmax (dBA)	Time
1	Along the east side of East Garry Avenue approximately 500 feet south of Pullman Street	64.9	58.5	79.0	12:00 p.m.
2	Along the east side of Alton Parkway approximately 700 feet from the intersection of Daimler Street and Alton Parkway	66.5	52.2	82.8	12:20 p.m.
3	Along the western portion of Duryea Avenue, approximately 500 feet south of SR-55	62.3	57.6	73.9	12:38 p.m.

Source: Acoustical Assessment (Appendix K)

Construction

Project construction activities for the proposed Project are anticipated to include demolition of the existing three buildings and pavement, site preparation and grading of the Project site, building construction of a new 91,500 square foot light industrial building, paving of onsite driveways, parking lots and truck loading area, and application of architectural coatings. Noise impacts from construction activities associated with the proposed Project would be a function of the noise generated by construction equipment, equipment location sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest noise sensitive receptors to the Project site are the single-family homes located as near as approximately 2,200 feet north of the Project site. In addition, a dialysis center is located 700 feet to the northeast of the site.

Section 18-314 (Special Provisions) of the City’s Municipal Code specifies that noise sources associated with construction activities are exempt from the City’s established noise standards as long as the activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or any time on Sunday or a federal holiday.

Construction noise impacts to the nearby sensitive receptors have been calculated as part of the Acoustical Assessment completed for the Project included as Appendix K. Anticipated construction equipment noise emissions are identified below. As shown the highest construction noise would be 66.4 dBA Leq.

Table N-4 Project Construction Noise Levels

Construction Phase	Receptor			Worst Case Modeled Exterior Noise Level (dBA Leq)	Noise Threshold (dBA Leq)	Exceeded?
	Land Use	Direction	Distance (feet)			
Demolition	Commercial	Northeast	700	63.5	85	No
	Residential	North	2,200	53.6	80	No
Site Preparation	Commercial	Northeast	700	64.7	85	No
	Residential	North	2,200	54.8	80	No
Grading	Commercial	Northeast	700	64.4	85	No
	Residential	North	2,200	54.4	80	No
Building Construction	Commercial	Northeast	700	66.4	85	No
	Residential	North	2,200	56.4	80	No
Paving	Commercial	Northeast	700	63.6	85	No
	Residential	North	2,200	53.7	80	No
Architectural Coating	Commercial	Northeast	700	50.8	85	No
	Residential	North	2,200	40.8	80	No

Source: Acoustical Assessment (Appendix K)

Table N-4 shows that construction noise levels would not exceed the 85/80-dBA threshold and would not exceed the City’s municipal code allowable Lmax. Additionally, compliance with Section 18-314 (Special

Provisions) of the City of Santa Ana Municipal Code would minimize impacts from construction noise, as construction would be limited to daytime hours. Therefore, no new impacts related to construction activities would occur.

Operation

The proposed Project would consist of the development of an industrial building. Potential noise impacts associated with the operations of the proposed Project would be from Project-generated vehicular traffic on the nearby roadways and from onsite activities, which have been modeled and identified below.

Mechanical Equipment. Stationary noise sources related to long-term operation of the Project would include mechanical equipment. Mechanical equipment (e.g. heating ventilation and air conditioning [HVAC] equipment) typically generates noise levels of approximately 52 dBA at 50 feet. At 700 feet away, the location of the dialysis center, mechanical equipment noise would attenuate to 29.1 dBA, which is below the City's 65 dBA standard. Therefore, no new impacts would occur.

Truck and Loading Dock Noise. During loading and unloading activities, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting braking activities; backing up toward the docks; dropping down the dock ramps; and maneuvering away from the docks. Loading or unloading activities would occur on the east and southeast side of the Project site. Vehicular access to the proposed Project site would consist of two driveways along Garry Avenue on the east/northeast side of the Project site. Typically, heavy truck operations generate a noise level of 68 dBA at a distance of 30 feet. At 700 feet northeast of the proposed loading areas, the dialysis center would experience truck noise levels of approximately 40.6 dBA, which is below the City's acceptable limits of 65 dBA for residential noise. Additionally, these noise levels would also be further attenuated by the intervening structures. Loading dock doors would also be surrounded with protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior activities, and as such, interior loading and associated activities would be permissible during all hours of the day. Noise levels associated with trucks and loading or unloading activities would not exceed the City's standards and no new impacts would occur.

Parking Noise. The Project would provide parking stalls, trailer parking stalls, and loading spaces on the north and south of the proposed warehouse building near the site perimeter. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 53 to 61 dBA at 50 feet. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors if any. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech. It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly Leq metric, which are averaged over the entire duration of a time period.

Actual noise levels over time resulting from parking lot activities would be far lower than the existing ambient noise levels identified above. Parking lot noise would occur within the surface parking lot on-site and would be up to 38.1 dBA at the nearest sensitive receptor (which is below the City's 65 dBA threshold) located approximately 700 feet away. Parking lot noise also currently occurs at the adjacent properties under existing conditions. Parking lot noise would be consistent with the existing noise in the vicinity and would be partially masked by background noise from traffic along Garry Avenue and SR-55. Therefore, no new noise impacts from parking lots would occur from the Project.

Off-Site Traffic Noise. As detailed in Section 5.17, *Transportation*, Table T-1, the proposed Project would result in a reduction of trips by 915 daily PCE trips, which include 137 less trips in the AM peak hour and 126 less trips in the PM peak hour than the existing three office buildings. Due to the decrease in traffic, no new traffic related noise impacts would result from the Project.

b) Generation of excessive ground borne vibration or ground borne noise levels?

Construction

No New Impact. Construction activities for the proposed Project would include demolition, excavation, and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the Project site could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

Demolition, excavation, and grading activities are required for the Project and can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Potential impacts of the Project are compared to the Federal Transit Administration (FTA) published standard vibration velocities for construction equipment operations in their 2018 Transit Noise and Vibration Impact Assessment Manual.

Based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity, which is below the FTA’s 0.20 PPV threshold for annoyance, as shown on Table N-5. The closest structure is the commercial use located approximately 40 feet from the Project construction area. Also, as shown Table N-5, construction VdB levels would not exceed 81 VdB at 40 feet (i.e., below the 100 VdB structural damage threshold). Therefore, no new impacts related to construction would occur from implementation of the Project.

Table N-5: Construction Equipment Vibration Levels

Equipment	PPV at 25 Feet (in/sec)	PPV at 40 Feet (in/sec)	VdB at 25 Feet	VdB at 40 Feet
Large Bulldozer	0.089	0.0440	87	81
Caisson Drilling	0.089	0.0440	87	81
Loaded Trucks	0.076	0.0376	86	80
Jackhammer	0.035	0.0173	79	73
Small Bulldozer/Tractors	0.003	0.0015	58	52

Source: Acoustical Assessment (Appendix K)

Operation

Once operational, the Project would not be a significant source of groundborne vibration. Groundborne vibration surrounding the Project currently result from heavy-duty vehicular travel (e.g., refuse trucks, heavy duty trucks, delivery trucks, and transit buses) on the nearby local roadways. Operations of the proposed Project would include passenger cars and trucks. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. Therefore, the Project would result in no new impacts related to ground born vibration.

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

No New Impact. The Project would not expose people residing or working in the Project site to excessive noise levels from aircraft. The nearest airport is John Wayne Airport that is located approximately 1.5 miles

south of the Project site. The Project site is located outside of the 65 dBA CNEL noise contours of the airport. Therefore, the Project would result in no new impacts related to exposure of people residing or working in the Project site to excessive noise levels from aircraft.

Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

Municipal Code Chapter 18, Article 7 Noise and Vibration Control (Noise Ordinance).

GPU EIR Mitigation Measures Applicable to the Project

- N-1 Construction contractors shall implement the following measures for construction activities conducted in the City of Santa Ana. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans submitted to the City: The City of Santa Ana Planning and Building Agency shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits.
- Construction activity is limited to the hours: Between 7 AM to 8 PM Monday through Saturday, as prescribed in Municipal Code Section 18-314(e). Construction is prohibited on Sundays.
 - During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
 - Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
 - Stationary equipment, such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses.
 - Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
 - Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning and Building Agency.
 - At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.
 - Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
 - During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically

adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

- Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.

Proposed Project Applicability: Mitigation Measure N-1 is applicable to the proposed Project and will be included in the Project MMRP.

N-2 Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

Proposed Project Applicability: Mitigation Measure N-2 is not applicable to the proposed Project because the Project does not involve pile driving and no fragile structures are located near the Project site.

N-3 New residential projects (or other noise-sensitive uses) located within 200 feet of existing railroad lines shall be required to conduct a groundborne vibration and noise evaluation consistent with Federal Transit Administration (FTA)-approved methodologies.

Proposed Project Applicability: Mitigation Measure N-3 is not applicable to the proposed Project because the Project does not involve development of residences and the site is not within 200 feet of a railroad.

N-4 During the project-level California Environmental Quality Act (CEQA) process for industrial developments under the General Plan Update or other projects that could generate substantial vibration levels near sensitive uses, a noise and vibration analysis shall be conducted to assess and mitigate potential noise and vibration impacts related to the operations of that individual development. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.

Proposed Project Applicability: Mitigation Measure N-4 is applicable to the proposed Project and an acoustical assessment has been completed and provided in Appendix K.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.14 POPULATION AND HOUSING.

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The GPU EIR addressed population and housing impacts on pages 5.13-12 through 5.13-15. The GPU EIR determined that full buildout of the GPU would result in a population of 431,629, and the City’s 2045 population growth would be approximately 20 percent greater than the Orange County Council of Governments’ 2045 projections. Furthermore, the city’s housing units at buildout would be 115,053, which exceeds the Orange County Council of Governments’ projection by 38 percent. The EIR determined that there are no feasible mitigation measures to mitigate the population and housing growth at buildout, and impacts would be significant and unavoidable.

The proposed GPU would provide more housing opportunities than currently exist. Therefore, implementation of the GPU would not displace people and/or housing, and impacts related to people and housing displacement would not occur.

Impacts Associated with the Proposed Project

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

No New Impact. The proposed Project would not directly result in unplanned population growth because it does not propose any residential dwelling units and development of the Project would be consistent with the General Plan land use and zoning designations for the site, which are used by both local and regional agencies to determine anticipated growth.

The FLEX-3 GPU land use designation allows for a FAR of 3.0 and the Interim Development Standard of M-1 does not include standards for lot size or density. The proposed Project would result in a FAR of 0.42, which is within the allowable FLEX-3 FAR; and the Project would be consistent with the M-1 (Light Industrial) development standards. Therefore, the Project is consistent with conditions evaluated under the GPU EIR and the Project would result in no new impacts related to unplanned population growth.

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

No New Impact. The Project proposes demolition of three existing office buildings and construction of a new light industrial building that would accommodate two tenants. The Project would not result in displacement of existing housing or necessitate the need for housing elsewhere. Therefore, the Project would result in no new impacts.

Conclusion

With regards to the issue area of Population and Housing, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

None.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.15 PUBLIC SERVICES.

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

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed public service impacts on pages 5.14-11 through 5.14-47. The GPU EIR The GPU would introduce new structures and allow for up to 22,361 new residents and workers in the OCFA and Santa Ana Police Department service boundaries, thereby increasing the requirement for fire protection facilities and personnel, as well as increasing the service needs for the Main Library and the Newhope Library Learning Center. The GPU would also generate additional students who would impact the school enrollment capacities of the Santa Ana Unified School District, Garden Grove Unified School District, and Orange Unified School District. However, upon implementation of regulatory requirements and standard conditions of approval the GPU would not create significant impacts related to fire protection services, police protection, library services, or school services.

Impacts Associated with the Proposed Project

The proposed Project would remove the existing 3 office buildings that total 103,031 square feet and develop one new light industrial building that would be 91,500 square feet and would accommodate two tenants. Based on the GPU buildout methodology, the existing office buildings generate 1 employee per 286 square feet, which would total 360 existing employees on the site at full occupancy. The GPU buildout methodology identifies that warehouses generate 1 employee per 800 square feet. Thus, full occupancy of the proposed Project would generate 114 employees, resulting in a reduction of 246 employees on the site.

a) Fire Protection

No New Impact. The nearest fire station is OCFA Fire Station 79, located at 1320 E Warner Avenue, approximately 1.3 miles to the Project site. The new industrial warehouse employees would replace the existing office employees on the site and result in a reduction of approximately 246 employees onsite at full occupancy. In addition, the existing older buildings would be replaced with new buildings with current fire safety infrastructure. Thus, the proposed Project use is not anticipated to increase the in demand for fire protection and emergency medical services, and the Project would not require construction of a new or physically altered fire station that could cause environmental impacts. Therefore, the Project would result in no new impacts related to fire protection services.

b) Police Protection

No New Impact. The nearest City of Santa Ana Police Station is the Santa Ana Southeast Substation, located at 1780 McFadden Ave #114B approximately 2.9 miles to north of the Project site. As described above, the Project would not increase the number of employees on the site. The proposed Project land use and operation would be similar to existing conditions. Crime rate and population density are not anticipated to be impacted by the Project, and the new building would include current security measures that would be reviewed by the City during the development permitting process. Therefore, the Project would result in no new impact related to police protection.

c) School Services

No New Impact. The nearest public school facilities include Monroe Elementary School (1.6 miles to the northwest), Manuel Esqueda Elementary School (2.2 miles to the northwest), Cesar E. Chavez High School (2.2 miles to the northwest), and Douglas MacArthur Fundamental Intermediate (2.2 miles to the west). The Project does not include any housing and would not directly create additional students to be served by schools. In addition, the Project would not increase the number of employees on site that could indirectly impact school attendance rates. Therefore, the Project would not result new impacts related to school services.

d) Parks

No New Impact. As discussed above, the Project would not create an additional need for housing; and would not directly increase the residential population of the City and generate additional need for parkland. Therefore, the Project would result in no new impacts related to parks.

e) Other Public Facilities

No New Impact. The Project would not result in a direct increase in the population of the Project site and would not increase the demand for public services, including public health services and library services which would require the construction of new or expanded public facilities. Therefore, the Project would result in no new impacts related to other public facilities.

Conclusion

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

California Fire Code, as included in Municipal Code Chapter 14.

GPU EIR Mitigation Measures Applicable to the Project

None.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.16 RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed recreation impacts on pages 5.15-27 through 5.15-31. The GPU EIR discussed that the GPU would generate additional residents that would increase the use of existing park and recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated. The GPU EIR describes that buildout of the GPU would require construction or expansion of recreation facilities that could result in environmental impacts, and although required park fees for development could be sufficient to fund new parks and improvements, there is a lack of available land and lack of land designated as Open Space to develop new parks or expand existing facilities. The City of Santa Ana is essentially built. The GPU EIR includes Mitigation Measure REC-1 to monitor new residential development within the Dyer/55 Fwy focus area would contribute to reducing impacts to existing public parks within a 0.5 radius of the focus area. Compliance with this mitigation measure, regulatory requirements, and implementation of proposed GPU policies and implementation actions would reduce the potential impact of the proposed GPU on existing park facilities. However, the GPU EIR determined that because of the existing park deficiencies and scale of development in park-deficient areas, the impact would be significant and unavoidable.

Impacts Associated with the Proposed Project

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

No New Impact. As discussed above, the Project would not create an additional need for housing; and would not directly increase the residential population of the City and generate additional need for parkland such that use of existing facilities would increase and physical deterioration would be accelerated. Therefore, the Project would result in no new impacts related to physical deterioration of park facility.

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

No New Impact. The Project does not propose the construction or expansion of recreational facilities. As discussed above, the Project would not create an additional need for housing and would not directly increase the residential population of the City to generate additional need for recreational facilities. Therefore, the Project would have no new impacts related to expansion of recreational facilities.

Conclusion

With regards to the issue area of Recreation, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

REC-1 The City shall monitor new residential development within the Dyer/55 Fwy focus area. Development proposals for projects including 100 or more residential units shall be required to prepare a public park utilization study to evaluate the project's potential impacts on existing public parks within a one half (1/2) mile radius to the focus area. The evaluation shall include the population increase due to the project and the potential for the new resident population to impact existing public parks within the radius. Each study shall also consider the cumulative development in the Dyer/55 Fwy and the potential for a cumulative impact on existing public parks within the radius.

If the study determines that the project, or its incremental cumulative impacts would result in a significant impact (substantial physical deterioration or substantial acceleration of deterioration) to existing public parks, the project shall be required to mitigate this impact. Measures to mitigate the significant impact may include but are not limited to land dedication and fair-share contribution to acquire new or to enhance existing public parks within the radius. Mitigation shall be completed prior to issuance of occupancy permits.

Proposed Project Applicability: Mitigation Measure REC-1 is not applicable to the proposed Project because the Project does not involve residential development.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
5.17 TRANSPORTATION. Would the project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed transportation impacts on pages 5.16-25 through 5.16-37. The GPU EIR determined that the GPU is consistent with adopted programs, plans, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Additionally, the EIR determined that implementation of the GPU would result in a reduction of vehicle miles traveled per service population (VMT/SP) in comparison to existing City conditions, and would achieve a VMT/SP at least 15 percent lower than the countywide VMT/SP. Also, the EIR determined that circulation improvements associated with future development pursuant to the GPU would be designed to adequately address potentially hazardous conditions (sharp curves, etc.), potential conflicting uses, and emergency access.

Impacts Associated with the Proposed Project

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

No New Impact. The Project would change the site from three office buildings that total 103,031 square feet to one 91,500 square foot light industrial warehouse building that would accommodate two tenants. Based on the existing square footage, it is estimated that the existing office buildings generate approximately 1,117 daily trips, with 157 trips (138 inbound and 19 outbound) in the AM peak hour, and 148 trips (25 inbound and 123 outbound) in the PM peak hour.

Table T-1 identifies the number of trips that would be generated by the Project. The Project trip generation is broken out by vehicle type and passenger car equivalent (PCE) factors are applied to the truck trips to determine the PCE trip generation. Passenger car equivalent factors account for the additional roadway capacity utilized by trucks due to their larger size, slower acceleration and reduced maneuverability when compared to passenger cars. As shown, the proposed light industrial warehouse building would generate

915 fewer trips on a daily basis than the existing office buildings, with 137 fewer trips in the AM peak hour, and 126 fewer trips during the PM peak hour.

The proposed light industrial warehouse building would generate 203 daily PCE trips including 20 AM peak hour and 22 PM peak hour trips. Compared to the existing trips generated from the existing three office buildings, the daily number of trips would be reduced by 915 trips, including 137 less trips in the AM peak hour and 126 less trips in the PM peak hour. Therefore, the Project would result in no new impacts related to roadway circulation.

Table T-1: Project Trip Generation

Trip Generation Rates										
ITE Land Use	ITE Code	Unit	Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
General Office Building	710	KSF	10.84	1.34	0.18	1.52	0.25	1.20	1.44	
Warehousing	150	KSF	1.710	0.131	0.039	0.170	0.050	0.130	0.180	
Project Trip Generation										
Project Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour			
				In	Out	Total	In	Out	Total	
Existing Use										
General Office Building	103.031	KSF	1,117	138	19	157	25	123	148	
Proposed Use										
Warehousing	91.500	KSF	156	12	4	16	5	12	17	
Passenger Vehicles	79.57%		124	10	3	13	4	10	14	
Trucks	20.43%		32	2	1	3	1	2	3	
Project Trips – Passenger Car Equivalents (PCE)										
Vehicle Type	Vehicle Mix	Daily Vehicles	PCE Factor	Daily	AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
Passenger Vehicles	79.57%	124	1.0	124	10	3	13	4	10	14
2-Axle Trucks	3.46%	5	1.5	8	1	0	1	0	1	1
3-Axle Trucks	4.64%	7	2.0	14	1	0	1	0	1	1
4+ Axle Trucks	12.33%	19	3.0	57	4	1	5	2	4	6
Total Truck PCE Trips				79	6	1	7	2	6	8
Total Proposed Project PCE Trips				203	16	4	20	6	16	22
Net Trips (Proposed PCE - Existing)				-915	-122	-15	-137	-19	-107	-126

Source: Trip Generation Comparison and VMT Assessment Memorandum, Appendix L

There is currently no transit, bicycle, or pedestrian facilities near the Project site. The closest OCTA bus stop is located at the intersection of Red Hill Avenue and Alton Parkway, approximately 0.6 mile from the Project site. In addition, there are no bicycle lanes or sidewalks near the Project site. The Project would not result in new impacts to transit or bicycle facilities. The proposed Project would install a new sidewalk along Garry Avenue and the site frontage that would improve the existing pedestrian circulation at the site. Thus, the Project would also not result in new impacts to pedestrian facilities. Overall, the proposed Project would not result in new impacts related to transportation.

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

No New Impact. Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse

gas (GHG) emissions." According to the law, "traffic congestion shall not be considered a significant impact on the environment" within CEQA transportation analysis. SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., a city's General Plan), studies, congestion management and transportation improvements, but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020. For example, in the City, the General Plan identifies LOS as being a required analysis, and even though it will no longer be a requirement of CEQA, unless the General Plan is amended, LOS will continue to be analyzed as part of Project review.

The Governor's Office of Planning and Research (OPR) updated the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA.

As shown in Table T-1, the existing three office buildings currently generates 1,117 daily trips including 157 trips during the AM peak hour and 148 trips during the PM peak hour. The proposed light industrial warehouse would generate 203 daily PCE trips including 20 trips during the AM peak hour and 22 trips during the PM peak hour. When compared to the existing office buildings, the Project would generate 915 fewer daily trips, including 137 less trips in the AM peak hour and 126 less trips in the PM peak hour. Based on the City's VMT screening threshold, projects that generate or add 110 or fewer daily trips are considered less than significant impact and do not require a VMT analysis. Because the Project would result in a reduction of vehicle trips, it would not exceed the City's VMT screening threshold, and no new impacts related to consistency with CEQA Guidelines section 15064.3, subdivision (b) would occur.

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

No New Impact. The proposed Project includes only an industrial warehouse facility. There are no proposed uses that would be incompatible. The Project would also not increase any hazards related to a design feature. Operation of the proposed Project would involve trucks entering and exiting the Project site from Garry Avenue for access to the loading bays via two 30-foot-wide driveways (on driveway to serve each tenant) on either side of the proposed building. The onsite circulation design prepared for the Project provides fire truck accessibility and turning ability throughout the site. Thus, no impacts related to vehicular circulation design features would occur from the proposed Project. Also, Project improvements would be consistent with development standards for streets, sidewalks, and other public places as specified in Chapter 33 of the City Municipal Code. The City Department of Public Works would ensure plans are consistent with design standards as part of building permitting. Therefore, the Project would not result in new impacts related to hazards due to a design feature.

d) Result in inadequate emergency access?

No New Impact.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of the driveway, and connections to existing infrastructure systems that would be implemented during construction of the proposed Project may require the temporary closure of one lane of Garry Avenue. However, the 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. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and that no new impacts would occur.

Operation

As described previously, the proposed Project would be accessed from a driveway along Garry Avenue. The site would include vehicle and truck access. The design and permitting of the onsite circulation would provide adequate and safe circulation. Because the Project is required to comply with all applicable City codes, as verified by the City no new impacts related to inadequate emergency access would occur from the Project.

Conclusion

With regards to the issue area of transportation, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

None.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.18 TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed tribal cultural resource impacts on pages 5.17-13 through 5.17-15. The GPU EIR describes that the Sacred Land File search for the GPU yielded positive results, indicating that known tribal resources exist within the plan area. Further, a CHRIS records search at SCCIC indicated that 23 archaeological resources were previously recorded within 0.5 mile of the City. Of these resources, eight archaeological resources were located within the City, which include four prehistoric sites with habitation debris and lithic scatters, one multicomponent site, and three historic isolates. The GPU EUR also describes that the City includes many locations that would have been favorable for prehistoric Native American occupation, and that while the City is urbanized, buried resources may remain in areas of minimal ground disturbance. Additionally, the GPU EIR describes that the Gabrieleño Band of Mission Indians – Kizh Nation identified sensitive areas within the City, and that buildout of the GPU may cause a substantial adverse change in the significance of tribal cultural resources. Thus, the GPU EIR determined that implementation of Mitigation Measures CUL-4 through CUL-7 would be required to reduce impacts relating to tribal cultural resources to less than significant.

Impacts Associated with the Proposed Project

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

No New Impact. This topic was evaluated in the GPU EIR (Impact 4.13-6) and was determined to be less than significant with mitigation.

As detailed previously in Section 5, Cultural Resources, the Project site does not meet any of the historic resource criteria and does not meet the definition of an historical resource pursuant to CEQA. Therefore, the Project would not result in impacts to historic resources that are listed or eligible for listing. As such, the Project would result in no new impacts related to historic resources that are listed or eligible for listing and have cultural value to a California Native American tribe.

- b) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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.**

No New Impact. Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California tribes as part of the CEQA process and equates significant impacts on “tribal cultural resources” with significant environmental impacts (Public Resources Code [PRC] § 21084.2). AB 52 requires that lead agencies undertaking CEQA review evaluate, just as they do for other historical and archeological resources, a project’s potential impact to a tribal cultural resource. In addition, AB 52 requires that lead agencies, upon request of a California Native American tribe, begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR for a project. AB 52 does not apply to a Notice of Exemption or Addendum.

As described in the GPU EIR, eight archaeological resources have been recorded within the City, including four prehistoric sites, one multicomponent site, and three historic isolates. The City includes many locations that would have been favorable for prehistoric Native American occupation, and buried resources may remain in areas where developments such as parking lots, parks, or structures with shallow foundations have required only minimal ground disturbance.

In addition, Project site soils consist of quaternary alluvium and undocumented fill materials that have the potential to include tribal cultural resources. Based on the moderate sensitivity of the site for resources, the Project would be required to implement GPU Mitigation Measure CUL-6 that requires a Native American monitor approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated with the Project area to monitor all ground-disturbing construction and pre-construction activities in areas of high sensitivity, which would reduce impacts consistent with the requirements of the GPU EIR. Therefore, the Project would result in no new impacts related to tribal cultural resources.

Conclusion

With regards to the issue area of tribal cultural resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

California Health and Safety Code Section 7050.5 regarding human remains

GPU EIR Mitigation Measures Applicable to the Project

Refer to Mitigation Measure CUL-6, listed in Section 5.5, *Cultural Resources*.

Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.19 UTILITIES AND SERVICE SYSTEMS.

Would the project:

a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The Final Recirculated GPU EIR addressed utilities and service system impacts on pages 5.18-35 through 5.18-64. The GPU EIR discussed that development pursuant to the GPU would require or result in the relocation or construction of new or expanded wastewater facilities. However, Orange County Sanitation District (OCSD) has a functioning and effective process in place to ensure the regional sewer infrastructure would support future developments under the Santa Ana GPU. Additionally, OCSD and OC Water District have adequate capacity to serve development pursuant to the GPU in addition to the providers existing commitments. The EIR also describes that development pursuant to the GPU would require or result in the relocation or construction of new or expanded water facilities. However, the City would have adequate capacity for the proposed increases in water flows across the city under implementation of the GPU and would be able to serve the additional dwelling units and commercial square footage proposed. Furthermore, GPU policies encourage the maintenance and upgrade of water infrastructure through impact fees from new development, and the exploration of other funding sources. Water supply would be adequate to meet development pursuant to the GPU. Existing and/or proposed stormwater drainage facilities would be able to accommodate proposed development pursuant to the GPU. Existing and/or proposed solid waste facilities

would be able to accommodate development pursuant to the GPU and comply with related solid waste regulations. Development pursuant to the GPU would require or result in the relocation or construction of new or expanded electric power and natural gas. However, the EIR determined that the net increase in natural gas demands due to the GPU buildout are within the amounts that SoCalGas forecasts that it would supply to its customers, and buildout would not require SoCalGas to obtain increased natural gas supplies over its currently forecast supplies.

Impacts Associated with the Proposed Project

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

No New Impact. The Project proposes to demolish the existing three office buildings that total 103,031 square feet, landscaping, and pavement, and construct a new 91,500 square foot light industrial warehouse building with landscaping that would accommodate two tenants.

Water

The Project site is currently served by the City's water utility. The proposed Project would install new water lines that would connect to the existing 8-inch water line within Garry Avenue. The Project would not require construction of new or expanded offsite water lines. The removal of the existing three office buildings and development of one light industrial warehousing building would not result in an increase in water demand, and no additional water lines are required.

Wastewater

The proposed Project would install new onsite sewer lines that would connect to the existing 8-inch sewer line within Garry Avenue. The Project would not require construction of new or expanded offsite sewer lines. The removal of the existing three office buildings and development of one light industrial warehousing building would not result in an increase in wastewater generation, and no expansions to the wastewater treatment system would be required.

Stormwater

The Project would install a new onsite drainage system that would connect to the existing 18-inch drain in Daimler Street. The onsite drainage would convey runoff to biofiltration basins that would treat flows prior to discharge, and reduce flows as required by the Orange County DAMP, which would be ensured through the Project permitting process. Therefore, operation of the proposed Project would not increase stormwater runoff, and 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.

Electric Power

The Project would connect to the existing Southern California Edison electrical distribution facilities that are adjacent to the Project site and would not require the construction of new electrical facilities.

Natural Gas

The Project would connect to the existing Southern California Gas natural gas distribution facilities that are adjacent to the Project site and would not require the construction of new gas facilities.

Therefore, the Project would result in no new impacts related to construction of new or expanded utilities that could result in 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?

No New Impact. Section 5.18, *Utilities and Service Systems*, of the GPU EIR describes that operation of the 55 Freeway/Dyer Road Focus Area at buildout (including development of the Project site at a FAR of 3.0) is anticipated to generate a 1,660,558 gallon per day increase in water demand that would be within the planned supplies from the City, the Orange County Water District, and Metropolitan during normal-dry and multiple-dry year scenario. The Project would result in a FAR of 0.42, which would result in a smaller building that would generate less water demand than the GPU EIR anticipated with a building density of 3.0 FAR on the site. Therefore, the proposed Project would be accommodated by the existing water supplies, and no new impacts related to water supplies would occur.

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?

No New Impact. Section 5.18, *Utilities and Service Systems*, of the GPU EIR describes that operation of the 55 Freeway/Dyer Road Focus Area at buildout (including development of the Project site at a FAR of 3.0) is anticipated to generate 538,450 gallons per day of wastewater. The GPU EIR also details that that the increase would be accommodated by OCSD's Treatment Plant No. 1. The proposed Project would result in a FAR of 0.42, which would result in a smaller building that would generate less wastewater generation than the GPU EIR anticipated with a building density of 3.0 FAR on the site. Therefore, the proposed Project would be accommodated by the existing wastewater infrastructure, and no new impacts related to wastewater facilities would occur.

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?

No New Impact. Section 5.18, *Utilities and Service Systems*, of the GPU EIR describes that operation of the 55 Freeway/Dyer Road Focus Area at buildout (including development of the Project site at a FAR of 3.0) is anticipated to generate 275,728 pounds per day of solid waste. The GPU EIR also details that the Orange County solid waste landfill system would have the ability to provide for the GPU with long-term solid waste landfill capacity.

The Project would result in a FAR of 0.42, which would result in a smaller building that would generate less solid waste than the GPU EIR anticipated with a building density of 3.0 FAR on the site. Therefore, the proposed Project would be accommodated by the existing landfills and no new impacts related to landfill facilities would occur.

In addition, the Project would comply with Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Also, pursuant to AB 341, at least 75 percent of the solid waste that is generated during Project operation is required to be recycled, which would reduce the volume of landfilled solid waste. Therefore, the Project would result in no new impacts.

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

No New Impact. As discussed above, the Project would be anticipated to result in 63.45 tons per year. All solid waste-generating activities within the City are subject to the requirements set forth in the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste.

The proposed Project would comply with all standards related to solid waste diversion, reduction, and recycling during Project construction and operation. Therefore, the proposed Project would not result in new impacts related to conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste.

Conclusion

With regards to the issue area of utilities and service systems, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

None.

GPU EIR Mitigation Measures Applicable to the Project

None.

	Project Peculiar Impact that is not Substantially Mitigated by Uniformly Applied Policies	Significant Impact not Analyzed as Significant in the Prior EIR	Potentially Significant Offsite or Cumulative Impact not Discussed in the prior EIR	Adverse Impact More Severe based on Substantial New Information	No New Impact
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5.20 WILDFIRES. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Summary of Impacts Identified in the GPU EIR

The GPU EIR describes that according to CAL FIRE, the nearest fire hazard severity zone (FHSZ) is approximately 4.0 miles east of the City along the western edge of Loma Ridge, and about 3.8 miles away from the City at the southern tip of the Peters Canyon Regional Park. The city is not in or near SRAs or lands classified as very high FHSZs. Additionally, no area in the city is on the wildland-urban interface. Therefore, the GPU EIR determined that no impacts related to wildfires would occur.

Impacts Associated with the Proposed Project

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

No New Impact. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles via Project roadways. A fire lane is included in Project design to provide adequate access for fire services. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. Therefore, The Project would result in no new impacts related to impairment of an emergency response plan.

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

No New Impact. The Project proposes a light industrial development on a developed site within an area characterized by existing industrial, commercial, and office uses. As such, the Project itself would not exacerbate wildfire risks as compared to existing conditions because it is representative of existing development in the area. The Project site is not in an area identified at risk of fire hazard as identified within the GPU EIR. Therefore, the Project would not result in new impacts related to exposure of people or structures to significant risk involving wildland fires.

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

No New Impact. The Project would not include 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. Therefore, the Project would result in no new impacts.

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

No New Impact. As previously discussed in Section 5.10, the Project site is not in an area susceptible to flooding and would not result in changes to drainage. Additionally, as discussed in Section 5.7, the Project site is not in an area susceptible to landslides. Therefore, the Project would result in no new impacts related to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Conclusion

Therefore, with regards to the issue area of wildfire, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Uniformly Applied Development Policies or Standards (DP/S)

California Fire Code, as included in Municipal Code Chapter 14.

GPU EIR Mitigation Measures Applicable to the Project

None.

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- Kimley-Horn and Associates Inc. 2021. "Preliminary Hydrology and Hydraulics Study for 1700 Garry Avenue" City of Santa Ana, CA.
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- . n.d. "RULE 403. Fugitive Dust." <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>.
- . n.d. "RULE 431.2. Sulfur Content of Liquid Fuels." <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf?sfvrsn=4>.
- Urbana Preservation & Planning. 2022. "Historical Resource Assessment (HRA) Memorandum 1700-1740 E. Garry Avenue, Santa Ana, California

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July 21, 2022

Attn: Konnie Dobрева
EPD Solutions, Inc.
2355 Main Street | Suite 100, Irvine, CA 92614

www.urbanapreservation.com

Via Email: konnie@epdsolutions.com

RE: Historical Resource Assessment (HRA) Memorandum | 1700-1740 E. Garry Avenue, Santa Ana, California.

Introduction and Purpose

The subject property at 1700-1740 E. Garry Avenue is composed of three detached office buildings, 1700, 1720, and 1740. The property was constructed in 1973 and is 49 years old. It is not located within a historic district and is not identified as a historic property in the City of Santa Ana [Property Information Search Database](#). The property has not been previously surveyed for eligibility under the City of Santa Ana Register of Historic Properties (Local Register), the California Register of Historical Resources (CRHR), or the National Register of Historic Places (NRHP).

A new project is proposed for the property and includes demolition of the three existing office buildings and construction of a new approximately 91,500 square foot light industrial warehousing building that would accommodate two tenants. One side of the building would have 42,700 square feet of warehouse space and 2,500 square feet of office and mezzanine space and the other would have 46,800 square feet of warehouse space and 2,500 square feet of office and mezzanine space. Each side of the building have 5 dock doors.

This Historical Resource Assessment (HRA) Memorandum was prepared to conform to City of Santa Ana General Plan Mitigation Measure CUL-1 *Identification of Historical Resources and Potential Project Impacts*. For structures 45 years or older, a Historical Resources Assessment (HRA) shall be prepared by an architectural historian or historian meeting the Secretary of the Interior’s Professional Qualification Standards. This HRA Memorandum was prepared by Urbana Preservation & Planning, LLC with contributions by Alexia Landa, BA, Historian and Wendy Tinsley Becker, RPA, AICP. Ms. Landa and Ms. Tinsley Becker exceed the Secretary of the Interior’s Professional Qualification Standards in the disciplines of history and architectural history. Preparer qualifications are attached.

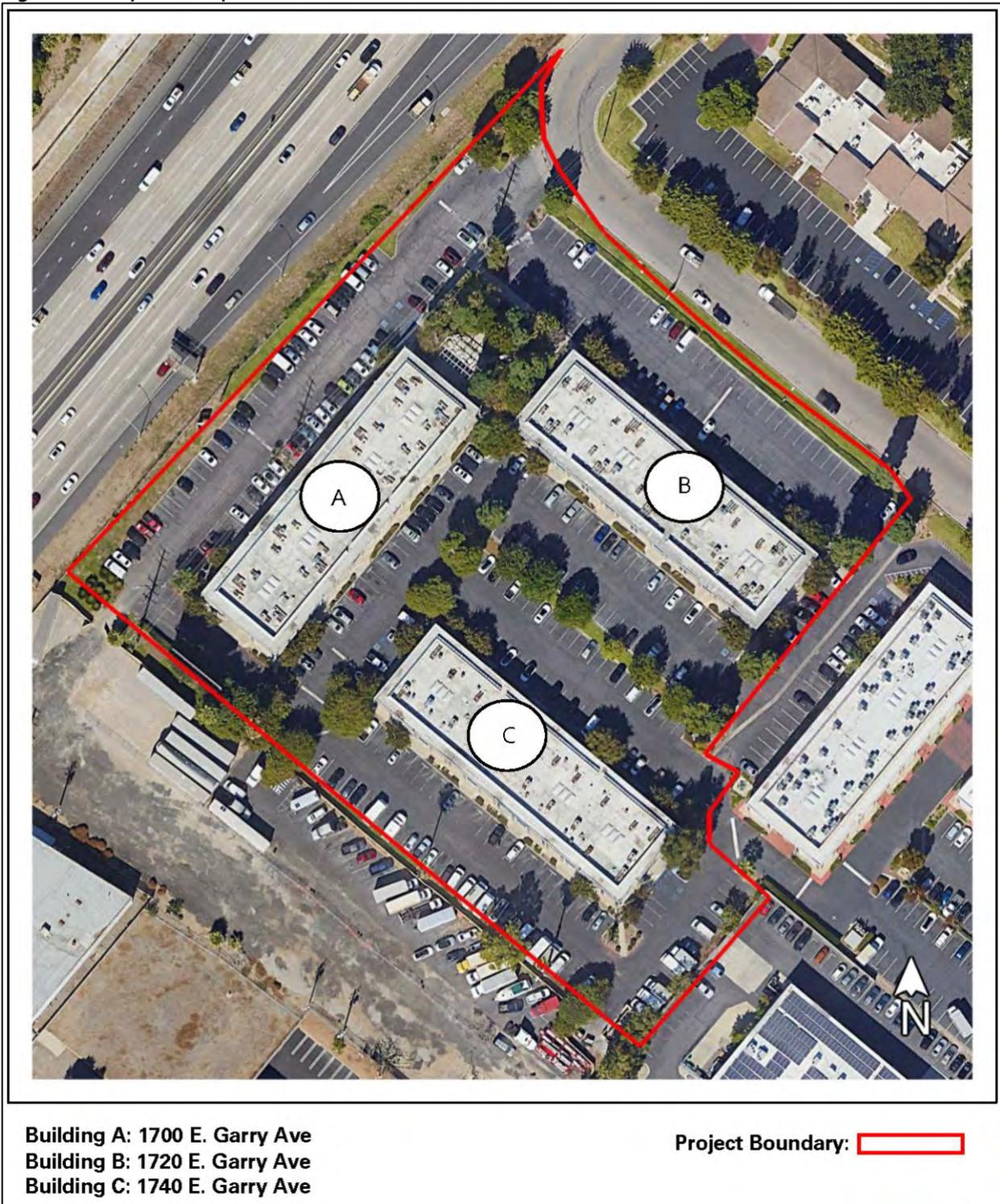
The purpose of the HRA Memorandum is to inform the City of the potential for the property’s eligibility under the criteria of the CRHR and the Local Register, contained within Municipal Code Section 30.2, and to assess impacts to historical resources pursuant to Section 15064.5 of the California Environmental Quality Act Guidelines resultant from a proposed project.

Definition of Study Area / Area of Potential Impact

The study area encompasses the proposed project boundary which conforms to the parcel boundary. 1700-1740 E. Garry Avenue is identified as Orange County Assessor Parcel No. 430-171-07. The study area was intensively surveyed to inform historical resource identification and project impacts analysis.

A study area map is included as Figure 1 on the following page. Results are summarized in the following pages.

Figure 1. Study Area Map



Intensive Level Survey Findings

The study area and subject property, 1700-1740 E. Garry Avenue is located on Block 9, Lot 116 of the Irvine Subdivision, and was annexed into the City of Santa Ana in 1968 as part of the Alton and Newport East Annex. The purpose of the annexation was to encourage industrial expansion of the city and as a source of future property tax revenue. Constructed in 1973, the subject property consists of three detached two-story, tilt-up concrete buildings that were developed by Rodeffer Investments, a company that was established in 1967. The 1700 E. Garry Avenue building (Building A) is located toward the far west end of the parcel and faces California State Highway 55. The 1720 E. Garry Avenue building (Building B) is located towards the north end of the parcel and faces E. Garry Avenue. The 1740 E. Garry Avenue building (Building C) is located towards the south end of the parcel and faces neighboring property 1021 Duryea Avenue. The buildings measure 230ft x 75ft and are approximately 17,000 sq ft. Surface parking surrounds the property.

The subject buildings are of identical construction and have a mostly symmetrical façade, a rectilinear floorplan, a flat roof, and minimal architectural detail throughout. The buildings feature precast ribbed concrete panel walls, a gray border below the roofline, vertical ribbon windows between horizontal aluminum dividers, evenly spaced recessed entryways with vertical wood-siding painted in gray, wood-framed fixed windows, and flush and paneled doors. Commercial concrete staircases are located on both ends of the buildings.

The 1700-1740 E. Garry Avenue property does not qualify for designation under the Local Register or the CRHR. The property and buildings do not exhibit features that would distinguish them architecturally or artistically, nor are they the work of a notable architect, builder, or designer under CRHR 3 / Local Register 1, 2, 3. No specific information was identified to indicate that the property exemplifies or represents a special element of Santa Ana's history or is connected with a business or use that was once common but is now rare under CRHR 1 and 2 / Local Register 4 and 6. Lastly, further research and analysis of the subject property is unlikely to yield information important to an archaeological site under CRHR 4 / Local Register 5.

To arrive at these conclusions, Urbana documented and evaluated the property on California Department of Parks and Recreation (DPR) 523 series forms. We researched the property using previous Phase 1 technical studies, the City of Santa Ana Property Information Search, building permit records, city directory listings, historic aerial imagery, newspaper archives, and Urbana's in-house architecture and construction history library. The DPR forms include current photos, a property description, construction history, historical narratives on Santa Ana, suburban office plazas and tilt-up concrete construction, and include assessment under of the Local Register and CRHR criteria.

Project Impacts Assessment

The 1700-1740 E. Garry Avenue property does not appear eligible for inclusion on the Local Register or the CRHR. As a result, the property does not qualify as an historical resource under CEQA. Future proposed projects would not cause an impact to historical resources within the Study Area / Area of Potential Impact. Because significant impacts have not been identified, additional mitigation is not recommended.

Refer to the attached DPR forms for additional property history and please contact the office with any questions or comments.

Respectfully Submitted,



Alexia Landa, BA

Attachment 1. DPR Forms | 1700-1740 E. Garry Avenue

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # _____
HRI # _____
Trinomial: _____
CRHR Status Code: 6Z
Other Listings: _____

Review Code _____ Reviewer _____ Date _____
Resource Name or #: **1700-1740 E. Garry Avenue**
Page 1 of 27

P1. Other Identifier: 1700 E. Garry Ave, 1720 E. Garry Ave, 1740 E. Garry Ave.; Garry Plaza Offices

***P2. Location:** Not for Publication Unrestricted

***a. County** Orange and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad** Tustin; Newport Beach **Date** 2022 **T** 5S; **R** 9W; of of **Sec** Unsectioned; **S.B. B.M.**

c. Address 1700-1740 E. Garry Avenue **City** Santa Ana **Zip** 92705

d. UTM: (Give more than one for large and/or linear resources) Zone 11, 420861.79 mE/ 3729744.97 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

The subject property is sited south of E. Garry Avenue on Block 9, Lot 116 of the 1887 Irvine Subdivision. Identified as Orange County Assessor's Parcel Numbers 430-171-07-00, the property is located towards the southeast end of the City of Santa Ana, California.

***P3a. Description:** The evaluated property is located on a parcel identified as 430-171-07-00 and consists of three detached commercial-use buildings addressed 1700, 1720, and 1740 E. Garry Avenue. The buildings are sited on an irregular parcel, approximately 5.13 acres, located on the south side of E. Garry Avenue. The surrounding area is composed of light commercial and industrial-use properties, with buildings of similar construction. **See Continuation Sheet for additional description.**



***P3b. Resource Attributes:** (List attributes and codes) (HP6)
Commercial Bldg.

***P4. Resources Present:** Building Structure Object Site District Element of District Other (Isolates, etc.)

P5b. Description of Photo: View of 1720 E. Garry Ave north elevation.

***P6. Date Constructed/Age and Source:**

-Historic: 1973

Building Permits

***P7. Owner and Address:**

OCTA

1720 E. Garry Ave., CA. 92705

***P8. Recorded by:**

Alexia Landa, B.A.

Urbana Preservation & Planning, LLC

www.urbanapreservation.com

***P9. Date Recorded:** July 2022

***P10. Survey Type:** Historical Resource Assessment

***P11. Report Citation:** (Cite survey report and other sources or enter "none.") None

***Attachments:** NONE Location Map Continuation Sheet Building, Structure, and Object Record Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record Artifact Record Photograph Record Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

Primary # _____

HRI# _____

CRHR Status Code: 6Z

Resource Name or #: **1700-1740 E. Garry Avenue**
Page 2 of 27

B1. Historic Name: Rodeffer Investments
B2. Common Name: 1700-1740 E. Garry Avenue
B3. Original Use: Commercial-Use B4. Present Use: Commercial-Use

*B5. Architectural Style: Tilt-up Concrete Construction

*B6. Construction History: Construction history is based on property building permits and historic and current aerial photography. In 1973, the subject property was initially improved with the construction of three tilt-up concrete buildings by land developer Rodeffer Investments. In November of 1973, Rodeffer Investments applied for a permit to construct three, two-story buildings (Permit No. 12296). The project was valued at \$608,256. Based on historic aerials, the approximately 17,000 sq ft buildings featured a mostly symmetrical façade with precast ribbed concrete panel walls, a flat roof, and rectilinear floorplan.

Over the years, several permits were submitted for electrical, plumbing, and sewer. The only identified alteration made to the exterior of the subject buildings was in 2012. That year a permit was submitted to reroof the existing buildings (Permit #10175124). **See Continuation Sheet for a complete list of property building permits.**

*B7. Moved? No Yes Unknown Date: _____ Original Location: _____

*B8. Related Features: No related features.

B9a. Architect: Not Identified b. Builder: Rodeffer Investments.

*B10. Significance: Theme N/A Area N/A Period of Significance N/A Property Type Commercial
Applicable Criteria Local Register / CRHR Ineligible

The study area and subject property, 1700-1740 E. Garry Avenue is located on Block 9, Lot 116 of the Irvine Subdivision, and was annexed into the City of Santa Ana in 1968 as part of the Alton and Newport East Annex.

Constructed in 1973, the 1700-1740 E. Garry Avenue property does not qualify for designation under the Local Register or the CRHR. The property and buildings do not exhibit features that would distinguish them architecturally or artistically, nor are they the work of a notable architect, builder, or designer under CRHR 3 / Local Register 1, 2, 3. No specific information was identified to indicate that the property exemplifies or represents a special element of Santa Ana's history or is connected with a business or use that was once common but is now rare under CRHR 1 and 2 / Local Register 4 and 6. Lastly, further research and analysis of the subject property is unlikely to yield information important to an archaeological site under CRHR 4 / Local Register 5. **See Continuation Sheet for additional information.**

B11. Additional Resource Attributes: N/A

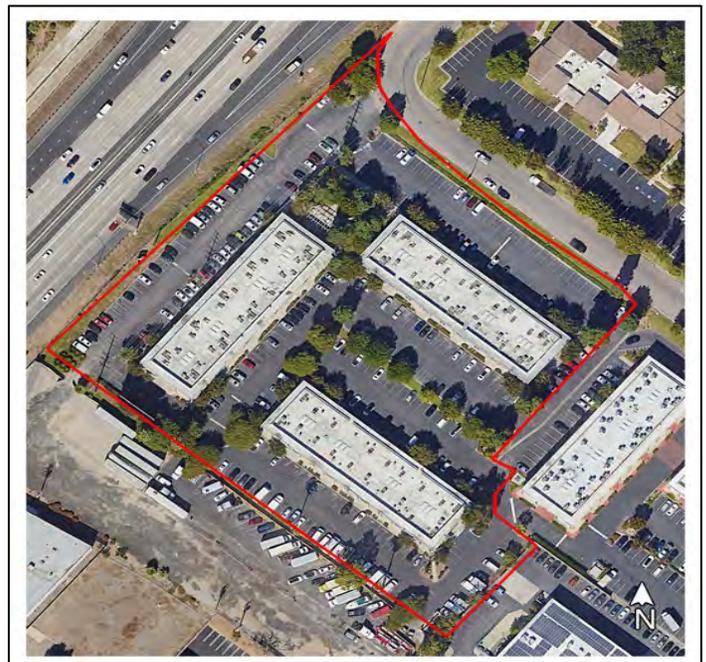
*B12. References: See Continuation Sheet for References

B13. Remarks: None

*B14. Evaluator: Alexia Landa, B.A.
Urbana Preservation & Planning, LLC

*Date of Evaluation: July 2022

(This space reserved for official comments)

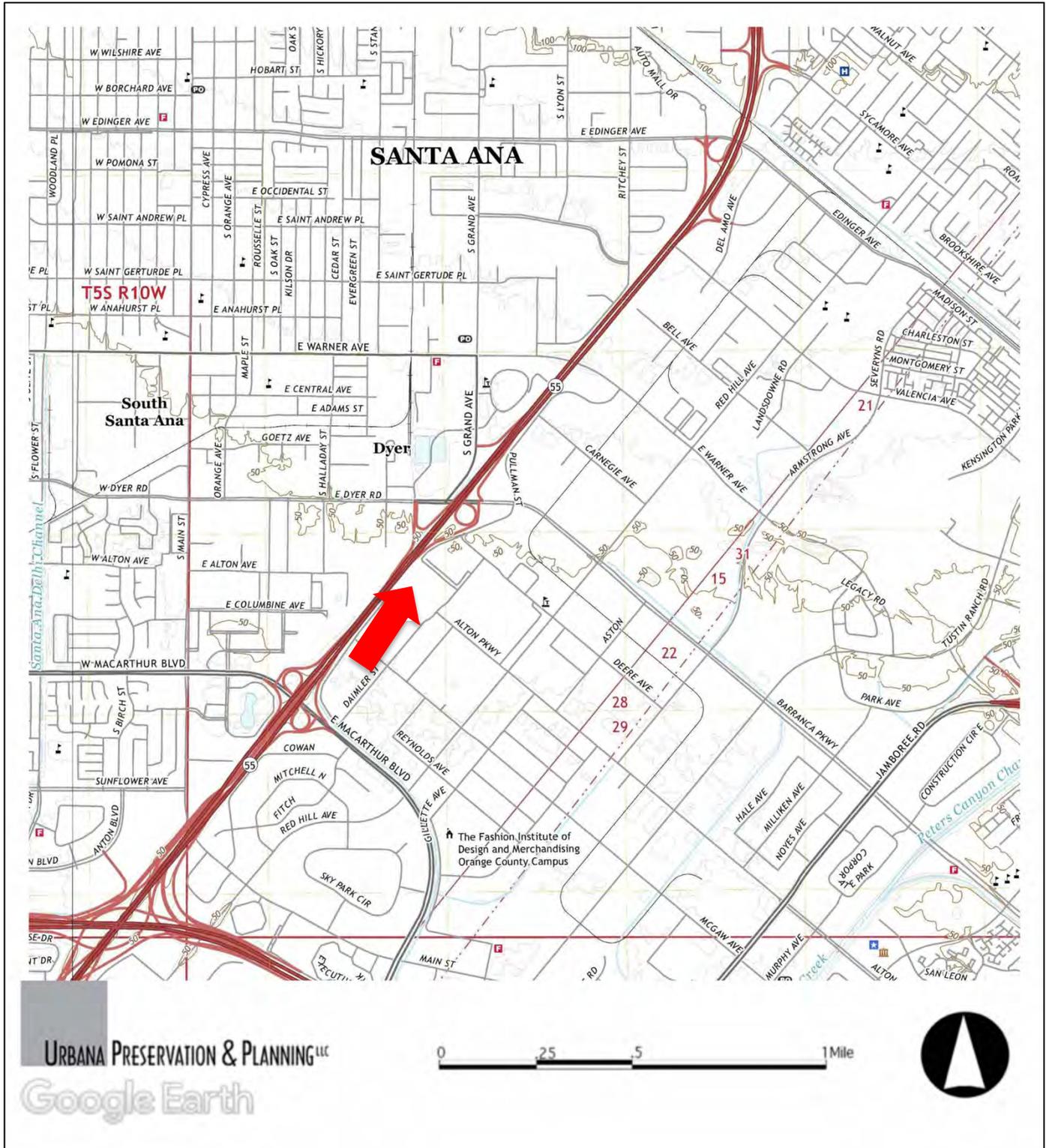


State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary# _____
HRI# _____
Trinomial# _____

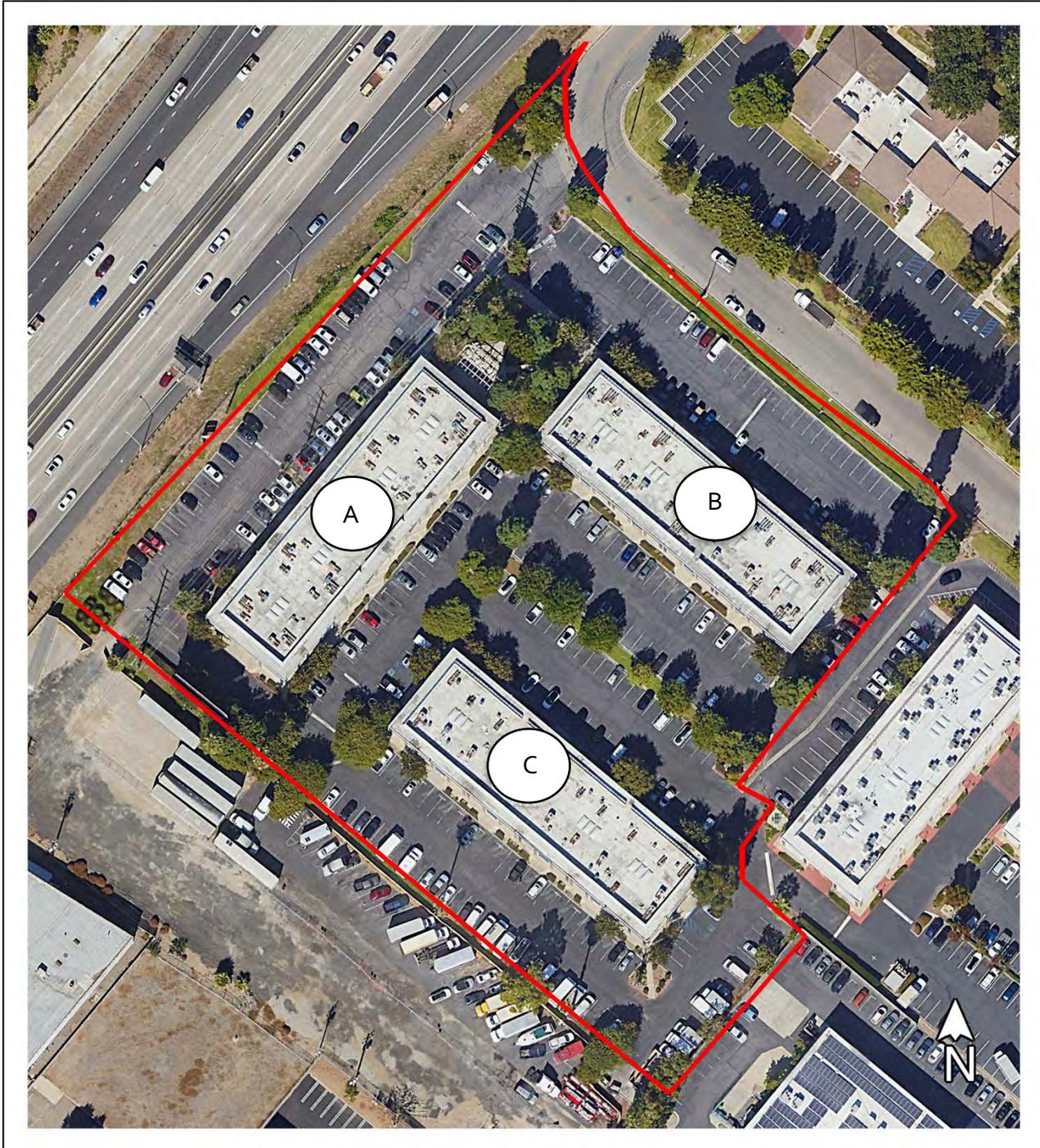
*Resource Name or # (Assigned by recorder) **1700-1740 E. Garry Avenue**

*Map Name: Tustin, Newport Beach USGS Quadrangle Maps *Date: 2022 *Scale: 1:24,000



Resource Name or #: 1700-1740 E. Garry Avenue

Site Plan



Building A: 1700 E. Garry Ave
Building B: 1720 E. Garry Ave
Building C: 1740 E. Garry Ave

Project Boundary: 

Resource Name or #: 1700-1740 E. Garry Avenue

Page 5 of 27

P3a. Description (Continued from page 1)

1700-1740 E. Garry Avenue Current Description

Built in 1973, the subject property consists of three detached two-story, tilt-up concrete buildings that were constructed by Rodeffer Investments, a company that was established in 1967. The 1700 E. Garry Avenue building (Building A) is located toward the far west end of the parcel and faces California State Highway 55. The 1720 E. Garry Avenue building (Building B) is located towards the north end of the parcel and faces E. Garry Avenue. The 1740 E. Garry Avenue building (Building C) is located towards the south end of the parcel and faces neighboring property 1021 Duryea Avenue. The buildings measure 230ft x 75ft and are approximately 17,000 sq ft. Surface parking surrounds the property.

The subject buildings are of similar construction and have a mostly symmetrical façade, a rectilinear floorplan, a flat roof, and minimal architectural detail throughout. The buildings feature precast ribbed concrete panel walls, a gray border below the roofline, vertical ribbon windows between horizontal aluminum dividers, evenly spaced recessed entryways with vertical wood-siding painted in gray, wood-framed fixed windows, and flush and paneled doors. Commercial concrete staircases are located on both ends of the buildings.

Current views of the property are included below and in the following pages.



View of the west elevation of the property; 1700 East Garry Ave.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary# _____
HRI# _____
Trinomial# _____

Resource Name or #: 1700-1740 E. Garry Avenue

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View of the south elevation of the property; 1700 East Garry Ave.



View of the east elevation of the property; 1700 East Garry Ave.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

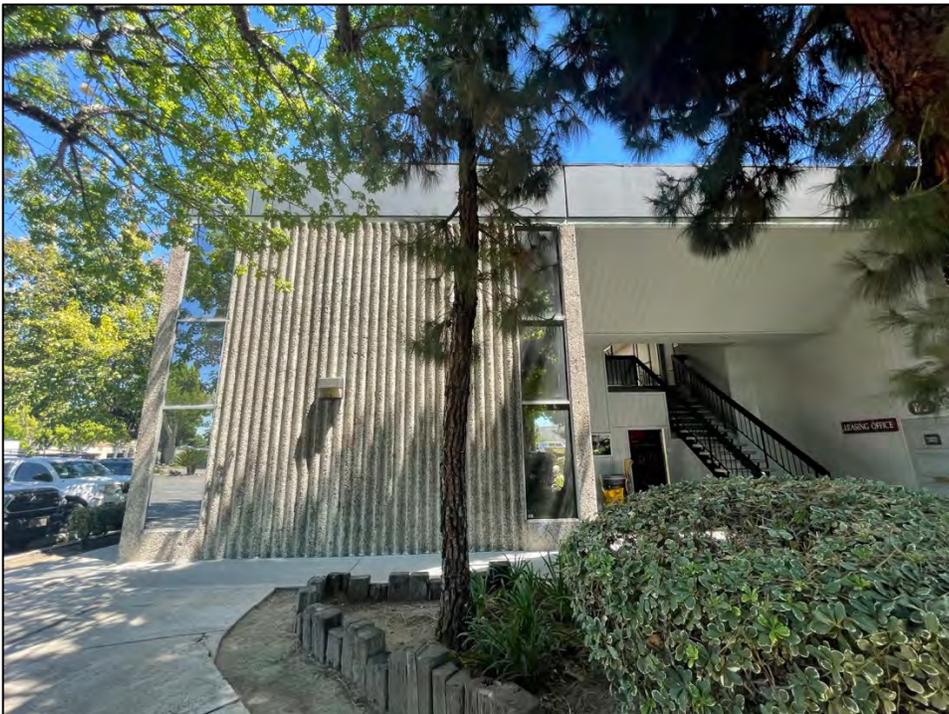
Primary# _____
HRI# _____
Trinomial# _____

Resource Name or #: 1700-1740 E. Garry Avenue

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View of the north elevation of the property; 1700 East Garry Ave.



View of the west elevation of the property; 1720 East Garry Ave.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary# _____
HRI# _____
Trinomial# _____

Resource Name or #: 1700-1740 E. Garry Avenue

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View of the north elevation of the property; 1720 East Garry Ave.



View of the east elevation of the property; 1720 East Garry Ave.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary# _____
HRI# _____
Trinomial# _____

Resource Name or #: 1700-1740 E. Garry Avenue

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View of the north elevation of the property; 1740 East Garry Ave.



View of the east elevation of the property; 1740 East Garry Ave.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary# _____
HRI# _____
Trinomial# _____

Resource Name or #: 1700-1740 E. Garry Avenue

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View of the south elevation of the property; 1740 East Garry Ave.



View of the west elevation of the property; 1740 East Garry Ave.

Resource Name or #: 1700-1740 E. Garry Avenue

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B6. Construction History (Continued from page 2)

Table 1. Permit History

Date	Permitted Work	Permit Issued to
11/8/73	Construct Buildings (Permit #12296)	Owner: Rodeffer Investments Contractor: Self
12/7/73	Plumbing (Permit #12495)	Owner: Rodeffer Investments Contractor: Karu Plumbing Co.
12/13/73	Electric (Permit #2159)	Owner: Rodeffer Investments Contractor: Not listed
2/15/74	Sewer (Permit #12955)	Owner: Rodeffer Investments Contractor: R & R Pipeline
4/5/74	Plumbing (Permit #13482)	Owner: Rodeffer Investments Contractor: R & R Pipeline
5/13/74	Plumbing (Permit #13950)	Owner: Rodeffer Investments Contractor: Not listed
7/23/74	Electric (Permit #4174)	Owner: Rodeffer Investments Contractor: R. E. Foley Electric
6/10/74	Install Interior Partitions -Suites 108-111 (Permit # 14244)	Owner: Rodeffer Investments Contractor: Not listed
1/16/78	Plumbing (Permit# 27097)	Owner: Edwards Laboratory Contractor: Niagara Plumbing
1/19/78	Plumbing (Permit# 27097)	Owner: Edwards Laboratory Contractor: Niagara Plumbing
12/29/82	Burglar Resistant Skylights in Corridor (Permit # 18478)	Owner: DVM Contractor: RMR Development
2/3/83	P-Trap (Permit # 40254)	Owner: DVM Contractor: RMR Development
2/3/83	P-Trap (Permit # 39564)	Owner: DVM Contractor: RMR Development
1/12/88	Plumbing (Permit # 27097)	Owner: Edward Laboratory Contractor: Niagara Plumbing
10/27/88	Install Satellite Dish (Permit #51110)	Owner: Mobile Home Part of America Contractor: Owner
12/1/12	Alteration Roof Screening (Permit #10175214)	Owner: Equitable Garry Plaza Contractor: Y S J Construction & Roofing
5/21/12	Reroof (Permit #10175124)	Owner: Equitable Garry Plaza Contractor: Y S J Construction & Roofing

Resource Name or #: 1700-1740 E. Garry Avenue

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B10. Significance (Continued from page 2)

Historic Overview of Santa Ana

William Spurgeon, a native of Kentucky, founded the City of Santa Ana in 1869.¹ Prior to the American Period, which began in 1848 following the signing of the Treaty of Guadalupe Hidalgo and the secession of California from Mexico to the United States, much of what is now Orange County, along with most of Southern California, was held by Mexican families in vast tracts comprised of tens of thousands of acres. In the fall of 1869 Spurgeon and his partner Ward Bradford purchased approximately 74 acres of what once was part of the Rancho Santiago de Santa Ana. The men split their holdings with Spurgeon taking the eastern half where he founded his town. The original plat for Santa Ana was small, but courageous on Spurgeon's part, only twenty-four blocks of approximately ten lots each. At the time Anaheim was the only other community in region. Other towns followed close behind Santa Ana, including the cities of Orange and Tustin, which were founded in 1870.

Santa Ana grew slowly at first. Spurgeon worked hard to ensure the success of his town by opening roads and digging wells, and when those no longer proved sufficient, he formed the Semi-Tropic Water Company to extend a canal from Orange to guarantee adequate water supply.² He also opened and operated a general store and post office with his brother at the corner of Fourth and West Streets (now Broadway). Because of Spurgen's efforts other businesses congregated in the area, establishing Fourth Street as the commercial district.³ By the late nineteenth century Santa Ana had the appearance of a mid-sized town with many multi-story Victorian style brick buildings. Fourth Street sported several business blocks, banks, hotels and opera house.

Santa Ana incorporated as a City in 1886 at the height of the real estate boom sweeping Southern California. Three years later, in 1889, present-day Orange County separated from Los Angeles County, incorporating as a separate municipality. Due to its geographical location at the center of the new county and its large population, Santa Ana was named as the County seat.⁴ By 1891 three railroad lines had been installed through Santa Ana; the Southern Pacific Railroad, which established Santa Ana as the end of the Orange County Line in 1877; the Santa Fe, which arrived in 1887 running from Los Angeles to San Diego; and the Santa Ana and Newport Railroad in 1891, which ran between Santa Ana and McFadden's Wharf in Newport Beach.⁵

Until the 1940s the economy of Santa Ana, as well as greater Orange County, rested primarily on agriculture. Early on grapes and livestock were the principal products of the region. Chili peppers and Lima beans were later preferred. At the turn of the twentieth century sugar beets, grown for sugar production, had become such a significant crop in the area that Santa Ana was coined the "Sugar City."⁶ Sugar beets were first grown in Orange County in 1891 and were shipped to Chino where the Oxnard brothers had recently opened a processing plant.⁷ Another sugar factory was opened in Los Alamitos in 1897. The year 1908 witnessed the

¹ Leo J. Friis, *Orange County Through Four Centuries* (Santa Ana, CA: Friis – Pioneer Press, 1982), 59 and Esther R. Cramer, Keith A. Dixon, Diann Marsh, Phil Brigandi and Clarice A. Blamer, eds. *A Hundred Years of Yesterdays* (Santa Ana, CA: The Orange County Centennial, Inc., 1988), 176, claim that Spurgeon hailed from Kentucky, while Charles D. Swanner, *Santa Ana: A Narrative of Yesterday, 1870 – 1910* (Saunders Press, Claremont, CA, 1953), 15, claims he was from Missouri.

² Pamela Hallan-Gibson, *The Golden Promise: An Illustrated History of Orange County* (Northridge, CA: Windsor Publications, Inc., 1986), 76.
³ Swanner, 17.

⁴ Cramer, et al., 36-37 and Friis, 96-98.

⁵ Hallan-Gibson, 112-113.

⁶ Cramer, et al., 41.

⁷ Friis, 104-105 claims this was in 1890, however the Chino plant didn't start operation until 1891, see "Beet Sugar in California," San Francisco Chronicle, 12 January 1891 as well as Torsten A. Magnuson, "History of the Beet Sugar Industry in California," *Annual Publication of the*

Resource Name or #: 1700-1740 E. Garry Avenue

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opening of the Southern California Sugar Company, located south of the intersection of Delhi Avenue (now Warner Avenue) and Main Street, in Santa Ana. Four years later, with the backing of James Irvine, another refinery opened in the city - the Santa Ana Cooperative Sugar Company (later subsumed by the Colorado company Holly Sugar). This one sited on Dryer Road approximately one mile east of Main Street.⁸ At the industry's height roughly 70 square miles of southwest Orange County were devoted to beet cultivation with four processing plants responsible for one fifth of the nation's refined sugar.⁹

The beet curly top virus struck the region in 1919. The disease deforms the plant making it unusable for sugar production. The outbreak seriously affected sugar beet crops in the early 1920s, causing a steep decline in production. At the same time tree crops such as apricots, walnuts and citrus replaced beet fields, rapidly becoming the most significant agricultural products for the local economy. By 1930 only one sugar factory in Santa Ana remained operational.¹⁰

During the 1920s the Santa Ana region also attracted a significant influx of successful mid-western farmers; many settled on area ranches while others chose the comforts of the smaller subdivisions that sprung up around downtown. The arrival of the Pacific Electric "Red Cars" in 1905 allowed urban development to push out beyond the traditional city center.¹¹ By the 1930s these small suburban tracts pushed further out into the agricultural lands, mostly north and west of the city center. The tendency to locate subdivisions further from established areas was further encouraged by the increasing popularity of the automobile. This trend continued as time progressed and the use of the automobile became more commonplace.

Residential construction overtook agriculture as the region's economic engine in the post-World War II era. Returning servicemen flocked to Orange County in search of the American Dream. Developers bought up prime agricultural land, put in streets and infrastructure and then started building houses, hundreds at a time. Massive subdivisions replaced once thriving groves. Freeways encouraged continued growth, each new mile opening up areas that were once relatively inaccessible. The Santa Ana Freeway (Interstate 5) traced its way south from Los Angeles reaching Santa Ana by 1952. Newly completed freeways provided easy access to the metropolitan area, effectively making Orange County a bedroom community of Los Angeles. Countless subdivisions advertised themselves within close proximity to freeways and metropolitan Los Angeles by association.

The freeway also encouraged industry to establish itself within the Santa Ana region. Research and high-tech manufacturing companies established a presence in the area because of the abundance of housing, well-educated labor and ready access to open space and recreation, and a connection to metropolitan Los Angeles via the limited access freeways allowed products to be efficiently transported into existing supply chains. The development of additional business caused need for more housing - and the cycle continued.¹² Between 1940 and 1960, the population of Orange County jumped from 130,760 to 703, 925 people.¹³

Historical Society of Southern California Part I Vol. XI (1918): 76-78. The same Oxnard brothers established a sugar refinery and town bearing their name in Ventura County, California.

⁸ Magnuson, 76-78.

⁹ Friis, 105 and Steve Emmons, "Sugar Factory in Santa Ana - How Sweet It Was," *Los Angeles Times*, 31 October 1999.

¹⁰ Friis, 105 and Orange County Historical Society, *Orange County* (Charleston, SC: Arcadia, 2005), 79.

¹¹ Friis, 118.

¹² Richard Bigger, James D. Kitchen, Lyndon R. Musolf and Carolyn Quinn, *Metropolitan Coast: San Diego and Orange Counties, California* (Los Angeles: Bureau of Governmental Research, 1958), 66-67 and Hallan-Gibson, 238.

¹³ Cramer, et al., 55.

CONTINUATION SHEET

Primary# _____

HRI# _____

Trinomial# _____

Resource Name or #: 1700-1740 E. Garry Avenue

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As subdivisions spread across the county shopping centers supplanted the traditional shopping areas like Fourth Street, Santa Ana. The new centers offered much that traditional downtowns shopping districts were missing. They were arranged for the pedestrian, often around a central mall, and stores were separated from car traffic and parking lots. They were also geographically closer to the newly developed suburbs, were conveniently located near freeways and had ample parking. Fashion Square was the first shopping center to open in Santa Ana area in 1958. The Bristol Shopping Center opened soon after, located at Bristol Street and Warner Avenue, in an area experiencing tremendous residential development.

Into the contemporary period, in the 1970s and 1980s, Santa Ana, Orange County, and the greater Southern California region experienced an uptick in development of suburban business parks and commercial office parks. A product of the country's post-WWII car culture that emerged in the early 1950s, most of these office complexes were speculative, for-profit endeavors intended to house numerous tenants, both large 'anchor' companies and smaller sole-proprietor businesses offering goods or professional services. In this period, the city annexed surrounding lands including portions of the 1887 Irvine Subdivision that forms the neighboring City of Irvine.

Corporate Office Parks and Suburban Business Plazas

The Cultural Landscape Foundation defines a corporate office park as a complex of office buildings, often sited on a large tract of land near an arterial highway, outside dense urban concentration. Suburbanization of corporate headquarters evolved in the mid-twentieth century when corporations such as IBM, Weyerhaeuser, Pepsico, and Connecticut General moved their offices out of city centers and closer to the residences of their senior executives. The grounds were arranged as rolling parkland, often utilizing low-rise buildings. The site planning, automobile approaches, visitor entrances, employee parking lots, and service docks all exemplified the functionalism of mid-twentieth century Modernism. These park-like locations often provided settings for the display of corporate collections of large-scale public art, and, in certain cases, display of large-scale products such as the tractors at John Deere.¹⁴ In contrast to these pastoral campuses, suburban business plazas emerged along arterial thoroughfares between highways. In Orange County, at the junction of Tustin, Irvine, and Santa Ana, countless examples are present with many constructed in the 1970s and 1980s in the contemporary period. Many were constructed using tilt-up methods.

Tilt-up Concrete Construction

The subject property, located on Block 9, Lot 116 of the Irvine Subdivision, was annexed into the City of Santa Ana in 1968 as part of the Alton and Newport East Annex. The purpose of the annexation was to encourage the industrial expansion of the city and as a source of future property tax revenue. The subject property is a commercial / light industrial tilt-up concrete building constructed in 1973. Tilt-Up construction is a method in which concrete wall panels are cast on-site and tilted into place. Thomas Edison, founder of the Portland Cement Company in 1899, explored and later promoted tilt-up concrete construction as early as ca. 1908 with the construction of tilt-up detached single-family homes in Union, New Jersey. The Portland Cement Company supplied concrete and tilt-up molds for projects throughout the United States. Robert Aiken, generally regarded as the father of the tilt-up methodology, began using this method around the turn of the 20th century with the earliest examples being retaining walls at the Camp Logan Rifle Range, in Illinois, and a concrete factory on Aiken's own farm near Zion City, Illinois. Aiken poured the walls flat on a bed of sand, around door and window frames, and then tipped them up onto their foundation. He used the tilt-up method to construct the Memorial Methodist Church in Zion, as well as a two-story ammunition and gun house at Camp Logan. From here, Aiken refined his methods to include a steel tipping table that was used in the construction of 15 buildings in five different states.

¹⁴ Cultural Landscape Foundation, *Corporate Office Park*. <https://www.tclf.org/category/defined-landscape-types/corporate-office-park>.

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The post-WW II construction boom created a demand for more efficient construction methods, creating inroads for the tilt-up industry. The advent of high-capacity mobile cranes, portable welders (for rebar), custom lifting devices, structural wall bracing, and ready-mix concrete trucks enabled builders to erect tilt-up buildings quickly. Into the 1970s, engineers began developing designs to use tilt-up concrete walls as load-bearing structural elements. The proliferation of microcomputers enabled more sophisticated architectural treatments and complex panel shapes. These methods and systems were employed throughout the United States, including in Southern California where suburban business parks and commercial-office / business centers were constructed in isolated campus settings and along auto corridors radiating through cities between connecting highways. By the 1970s, Tilt-up construction was widely recognized by builders and commercial real estate owners as durable, with less opportunity for leaks, and an efficient construction process, making it the primary method of industrial and commercial buildings constructed in the 1970s and beyond, secondarily resulting in a monotonous horizontal landscape throughout Southern California's commercial-industrial zones. By the mid-1980s the Tilt-Up Concrete Association (TCA) was formed from the Portland Cement Association to provide input to code bodies, develop technical information to meet the needs of the Tilt-Up industry, and promote the benefits of Tilt-Up. Originally led by Executive Director Don Musser, the TCA was originally funded by the Concrete Reinforcing Steel Institute (CRSI) and the National Ready Mixed Concrete Association (NRMCA), with each association also providing organizational support.¹¹

In the contemporary period, the most significant examples of cast concrete, tilt-up, and modular construction generally originate from the Brutalist style. From the French phrase *béton brut*, meaning "raw concrete," Brutalist architecture peaked in the 1960s and 1970s, but the style began several decades earlier, following World War II as Europe was in a state of rebuilding. The word "brutalism" in relation to architecture was coined in 1950 by Swedish architect Hans Asplund in reference to a home called Villa Göth. The style was designed for function and utilitarianism and was primarily used in social and institutional buildings. Mass-produced tilt-up buildings like 1700-1740 E. Garry represent the basest form of modular construction and are not regarded as examples of Brutalism, sharing only a common material and temporal dimension.

Property Ownership History

Between 1973 and 1974, the property was under the ownership of the Rodeffer Investments.¹⁵ Rodeffer Investments was a local land development company that was founded by Elmer Orion Rodeffer in 1967. During the 1960s and 1990s, the company purchased several investment properties and constructed both commercial and industrial-use buildings throughout the Orange County area.¹⁶ They were known for using the tilt-up concrete building method, which offered a fast, efficient, and economical way to build.¹⁷ From their main office in Newport Beach, the company designed custom office condominiums at affordable prices. By the 1980s, as the company expanded they established a partnership with the Hawthorne Development Company.¹⁸ Together they designed and constructed several commercial-use buildings in the Laguna Hills area.¹⁹ In 1981, the company was awarded the Construction Industry Award For Engineering Excellence for their work on an unidentified project in Sun City.²⁰ Around this time, Rodeffer Investments served as the starting point for noted architect Mark Singer, who briefly worked at the company following his graduation from California State Los Angeles.²¹ Singer would go on to become an award-winning architect in Laguna and a fellow of the American Institute of Architect's.²² Over the years, the property was acquired by different

¹⁵ *Los Angeles Times*, May 2, 1974.

¹⁶ *Ibid*; *Las Vegas Review-Journal*, March 23, 1997.

¹⁷ *Ibid*.

¹⁸ *Ibid*.

¹⁹ *The Los Angeles Times*, July 12, 1981.

²⁰ *Los Angeles Times*, May 3, 1981.

²¹ *Los Angeles Times*, September 28, 2015.

²² Mark Singer, *Mark Singer Architect: Awards*. Website. <http://www.marksingerarchitects.com/awards>.

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Primary# _____

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owners and offices were rented by several businesses. During historic research, little substantive information was found on the owners and occupants. Today, the property is under the ownership of the Orange County Transportation Authority and continues to serve as a commercial-use property.

Table 2. Partial Property Ownership History

Date	Owner	Source
1973-1974	Rodeffer Investments	Building Permit
1978-1988	Edward Laboratory	Building Permit
1988	Mobile Home Part of America	Building Permit
2012	Equitable Garry Plaza	Building Permit
2017-2019	Garry Owners, LLC	Phase I Environmental Site Assessment
2021-present	Orange County Transportation Authority	Orange County Assessor's Office

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B10. Significance (Continued from page 2):

Local Register Criterion 1: Buildings, structures or objects with distinguishing characteristics of an architectural style or period, that exemplify a particular architectural style or design features.

Under Criterion 1, the buildings do not qualify for listing in the Santa Ana Register of Historic Properties. Built in 1973, the buildings are basic, tilt-up construction, commercial-use structures that do not embody the distinguishing characteristics of an architectural style or period. Like many of the commercial/light industrial-use buildings in the area, the structures have a more utilitarian appearance and rather than attractive were meant to be functional and affordable. As such, the buildings do not exhibit features that would distinguish them architecturally or artistically. For this reason, the buildings are not eligible under Criterion 1.

Local Register Criterion 2: Works of notable architects, builders, or designers whose style influenced architectural development.

The subject buildings were not identified as the work of a notable architect, builder, or designer. Therefore, the buildings are not eligible under Criterion 2.

Local Register Criterion 3: Rare buildings, structures, or objects or original designs.

Under Criterion 3, the subject buildings are not considered rare, but rather of common construction that utilized the tilt-up concrete building method. Tilt-up concrete construction was meant to be cost-effective, efficient, and functional, and as such is visible in several commercial and industrial-use properties in the area. The construction method was typically applied to one-story buildings but is not unusual to be used for structures as tall as four stories. For this reason, Urbana opines the 1700-1740 E. Garry Avenue property not eligible under Criterion 3.

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

The 1700-1740 E. Garry Avenue commercial-use buildings do not have an association with events or persons that have made significant contributions to the local, regional, or cultural heritage of California. The buildings were not constructed during the initial development of Santa Ana and the property did not serve as an important center that contributed to the political, social, economic, or cultural activity of the city. The buildings are one of several commercial/ industrial-use buildings that were constructed during the 1970s and 1980s around the peripherals of the city. No specific information was identified to indicate that the property, in and of itself, exemplifies or represents a special element of Santa Ana's history. For this reason, the property is not eligible for designation under Criterion 4.

Local Register Criterion 5. Sites of archaeological importance.

Local Register Criterion 5 is typically applied to archaeological sites. Research and analysis of the 1700-1740 E. Garry Avenue property is limited to above ground historic resources. Therefore, the property is not eligible under Local Register Criterion 5.

Local Register Criterion 6: Buildings or structures that were connected with a business or use which was once common but is now rare.

Research does not indicate that the subject property was connected with a business or use which was once common but is now rare. Therefore, the property is not eligible under Criterion 6.

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CALIFORNIA REGISTER OF HISTORICAL RESOURCES (CRHR) ELIGIBILITY REVIEW

CRHR Criterion 1: Association with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

This is equivalent to Local Register Criterion 4 and 6. Research does not indicate that the subject property qualifies for designation under Criterion 1. The subject property is located on Block 9, Lot 116 of the Irvine Subdivision. The property was initially improved in 1973 with the construction of three commercial-use buildings. The buildings were constructed at a time when the City of Santa Ana experienced increased development of suburban business parks and commercial office parks during the 1970s and 1980s. Most of these office complexes were speculative, and for profit endeavors intended to house numerous tenants. To encourage the industrial and commercial expansion around the peripherals of the city, surrounding lands, including portions of the 1887 Irvine Subdivision, were annexed into the city. The subject property is one of many commercial / industrial-use properties constructed in the area during this period. The property does not appear to be individually significant, nor did it make a significant contribution to the broad patterns of California's history and cultural heritage. For this reason, Urbana determined the property is not individually eligible under Criterion 1.

CRHR Criterion 2: Association with the lives of persons important in California's past.

This is equivalent to Local Register Criterion 4. Research does not indicate that the subject property qualifies for designation under Criterion 2. The 1700-1740 E. Garry Avenue is not associated with the lives of persons important to local or California history. Therefore, the subject property does not qualify under Criterion 2.

CRHR Criterion 3: Embodies the distinctive characteristics of a type, period, or method of construction, or represent the work of an important creative individual or possess high artistic values.

This is equivalent to Local Register Criterion 1, 2, and 3. Under Criterion 3, the building is not the work of a master and does not possess high artistic values and does not rise to a level beyond the ordinary. For this reason, Urbana determined the property is not individually eligible under Criterion 3.

CRHR Criterion 4: Potential to yield information important in prehistory or history.

This is equivalent to Local Register Criterion 5. The subject property is not eligible under Criterion 4 as it is unlikely to yield information important in prehistory or history.

Integrity

Integrity is the ability to physically convey significance. Evaluation of integrity must always be grounded in an understanding of a resource's physical features and how they relate to its significance. To retain historic integrity, a resource will possess several, and usually most of the following seven aspects of integrity: location, materials, design, setting, workmanship, feeling, and association. If it is determined that a resource is eligible for designation because it meets one or more of the adopted designation criteria, the integrity of the resource must be evaluated. Integrity is the ability to convey its significance. Only after the historic significance of the resource is fully established can the issue of integrity be addressed.

The 1700-1740 E. Garry Avenue property has not been found by Urbana to be individually eligible for designation under any of the criteria. Further integrity analysis is not merited.

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***B12. References (Continued from page 2):**

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City of Santa Ana. Building Permits for 1700-1740 E. Garry Avenue. On file at the City of Santa Ana, Building Division.

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Historic Aerials



1972 aerial of the subject property and surrounding area. No structures are visible on the parcel.
Source: Earth Explorer

State of California - The Resources Agency
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March 1973 aerial of the evaluated property and surrounding area. No structures are visible on the property. The property was not improved until November of 1973.
Source: Frame Finder, UC Santa Barbara Library.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
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Trinomial# _____

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1974 aerial of the evaluated property and the surrounding area. The buildings continue to appear in their original footprint.

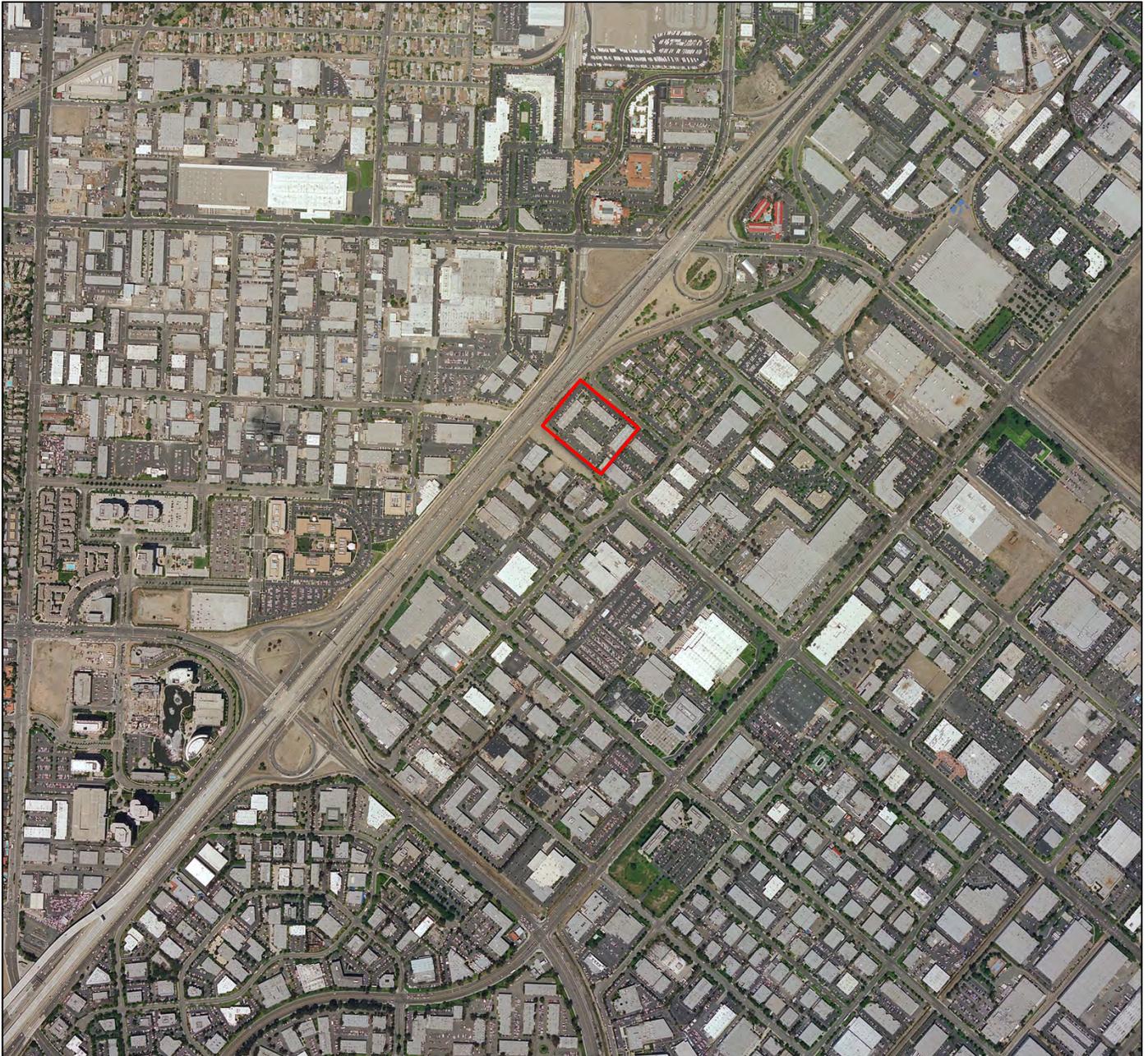
Source: Frame Finder, UC Santa Barbara Library.

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
CONTINUATION SHEET

Primary# _____
HRI# _____
Trinomial# _____

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2007 aerial of the evaluated property and the surrounding area. The buildings continue to appear in their original footprint.

Source: Frame Finder, UC Santa Barbara Library.

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Newspaper and Genealogical Database Search Results for Owners and Occupant



The subject property was initially improved in 1973 by the Rodeffer Investment Company. The company was known for utilizing the tilt-up concrete method of construction, which offered a fast, efficient, and economical way to build

Source: *Los Angeles Times*, June 15, 1971.

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Office Condos on Market in Santa Ana

Completion is scheduled Friday at Garry Plaza Office Park, 1800-1820 E. Garry St., Santa Ana, a \$7.25-million office condominium project which offers 84 suites ranging from 412 to 2,000 square feet in size.

Prices range from \$47,000 to \$235,000 and immediate move-ins are available; some buyers have occupied their premises, according to the developer, Rodeffer Investments. At midweek, 37 suites had been sold.

The developer offers financing with down payments of 15% to 25%. Furnished and decorated model offices are open daily from 9 a.m. to 5 p.m.

In addition to 1700-1740 E. Garry Avenue, Rodeffer Investments also constructed the 1800-1820 E. Garry Avenue buildings located directly east of the property.

Source: *Los Angeles Times*, Feb 10, 1980.

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Office Condo Project Opens in Laguna Hills

South Pointe I, a \$5-million, 30,338-square-foot joint venture development of Hawthorne Development Co. and Rodeffer Investments of Santa Ana, has opened in Laguna Hills with 36 office condominiums starting at \$65,250.

Scheduled for completion Aug. 1, the air-conditioned units range in size from 450 to 2,100 square feet. The downstairs larger units each have a private restroom, coffee bars, parquet floor entry and storage area. Marc Dale Engineering and Stewart White Design designed the project, at 23276 South Pointe Drive.

During the 1980s, as the company continued to grow, they established a partnership with local building company, Hawthorne Development Co., and constructed several custom commercial-use buildings primarily in the Laguna Hills area.

Source: *Los Angeles Times*, July 12, 1981.

Attachment 2. Preparer Qualifications

Alexia Landa, BA
Historian + Archaeologist
alexia@urbanapreservation.com

Alexia Landa is a Veteran of the United States Navy having served from 2007-2012, including deployments in the Middle East. For the USN, she served as an Aircrew Survival Equipmentman. In this capacity she inspected aircraft and aircrew life-support equipment for evidence of abuse, damage, or malfunction. She holds a Bachelor of Arts (double major) in History and Anthropology from San Diego State University. Prior to joining Urbana, Alexia served as an Archaeological Specialist for the California Department of Parks and Recreation Southern Service Center where she performed archaeological monitoring and site assessment activities for a variety of project types including State Park facility improvements, historic building maintenance, and municipal water and sewer system repair and replacement. She meets *The Secretary of the Interior's Historic Preservation Professional Qualifications Standards* in the discipline of History. At Urbana Alexia leads field survey and monitoring activities, conducts contextual and site-specific research, prepares historic context statements, and authors technical reports and site records. Ms. Landa's passion for history is demonstrated through her volunteer work with the Museum of Man, the San Diego Museum of Natural History, and as a member of the Board of Directors for the San Diego County Archaeological Society.

PROJECT EXPERIENCE

In-Progress	Glen Canyon National Park Service Post 1955 Housing Survey and MPDF, Page, AZ
2021	351 Watson St. Historic Evaluation; Monterey, CA
2018-2021	Southern California Edison Company Transmission Line Rating Remediation Program, Historic-Era Built Environment Survey Report Ivanpah-Control Project, Inyo, Kern, and San Bernardino Counties, CA
2021	Transmission Line Rating & Remediation Project, Ivanpah Control Line, Archival Research Package, Southern California Edison, Southern CA
2020-2021	Southern California Edison Company Transmission Line Rating Remediation Program, Historic-Era Built Environment Survey Report Eldorado -Pisgah-Lugo Project, San Bernardino County, California and Clark County, Nevada
2021	City of Escondido Delisting and Re-evaluation, 340 Waverly Place, San Diego, CA
2021	City of Monrovia Historia Resource Analysis Report, 213-217 Novice Lane, Monrovia, CA
2021	City of Coronado Determination of Historic Significance, 710 10 th Street, Coronado, CA
2021	City of San Diego Historic Property Survey Report, 3167 Market Street, San Diego, CA
2021	Village of Fallbrook DPR Evaluation, 129 S. Vine Street, Fallbrook, CA
2021	City of Coronado Determination of Historic Significance, 202 B Street-1216 2 nd Street, Coronado, CA
2021	City of Coronado Determination of Historic Significance, 136 F Avenue, Coronado, CA
2021	American Silk Factors Mill Historic Resource Analysis Report, 528 N. Mission Road, San Marcos, CA
2021	Irwindale DPR Evaluation, 5265 N 4 th Street, Los Angeles, California
2021	East Gilman Channel Mitigation Historic American Engineering Record, Banning, California

EDUCATION

Bachelor of Arts-
 History and Anthropology
 School of Arts and Letters,
 California State University, San Diego

PROFESSIONAL EXPERIENCE

Historian + Archaeologist: Urbana
 Preservation & Planning, LLC
 (San Diego) 2018 – present

Field Archaeologist / Historian:
 Loveless & Linton, Inc. Cultural
 Preservation & Archaeology
 (San Diego) 2017-2019

Archaeological Project Leader:
 California State Parks, Southern
 Service Center (San
 Diego) 2017-present

Field Archaeologist:
 PanGIS, Inc. (San Diego) 2017

Field Archaeologist:
 Channel Islands National Parks
 Services (Santa Rosa) 2017

PROFESSIONAL MEMBERSHIPS

Society of California Archaeology
 —
 Board Member: San Diego County
 Archaeological Society
 —
 Society of Architectural Historians



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Mountain Region
280 W. Kagy Blvd., #D-186
Bozeman, MT 59715

Midwest Region
2400 E. Main St., #103-218
St. Charles, IL 60174

- 2021 Getchell Ranch Historic American Building Survey, 4055 Lytle Creek Road, Fontana, California.
- 2020 Jurupa Valley Mira Loma Quartermaster Depot Historic Resource Analysis Report, Riverside County, CA
- 2020 City of Coronado Determination of Historic Significance, 457 E Avenue, Coronado, CA
- 2020 City of Coronado Determination of Historic Significance, 518 Adella Lane, Coronado, CA
- 2020 Rancho Miramonte Project Historic Property Survey Report, Chino, CA
- 2020 City of Coronado Determination of Historic Significance, 800 1st Street, Coronado, CA
- 2020 City of Coronado Determination of Historic Significance, 610 10th Street, Coronado, CA
- 2020 Southern California Edison Company Transmission Line Rating Remediation Program, Historic-Era Built Environment Survey Report | Kern River to Los Angeles Project, Kern and Los Angeles Counties, California
- 2020 Even Hewes Highway / Coyote Wash Bridge Historic Property Survey Report, Imperial County, California
- 2019-2020 Southern California Edison Company Transmission Line Rating Remediation Program, Historic-Era Built Environment Survey Report | Control-Silver Peak Transmission Corridor, Inyo and Mono Counties, California
- 2019 Lindsay Substation and Bliss-Lindsay 66kV Sub-Transmission Line Historic Property Survey Report, Lindsay, CA
- 2019 Pedley Powerhouse Historic Property Survey Report, Norco, California
- 2017-2019 Crew Chief / Archaeological Monitor for linear trench utility excavations; prepared daily reporting, photo documentation, and artifact recordation; facilitate contractor and crew communications.
- 2017 Site excavation, artifact identification, screening, and lab analysis for ancient paleocoastal site at Santa Rosa Island within Channel Islands National Park
- 2017-2020 Archaeological Project Leader for California State Parks projects in San Diego, Imperial, Kern, Orange, Los Angeles, Ventura, Santa Barbara, San Luis Obispo Counties.

ACTIVITIES & HONORS

- SDSU School of Arts and Letters,
Dean's List
—
- SDSU Anthropology Graduate
Students Association
Undergraduate Writing
Contest, 1st Place Winner, 2016
—
- SDSU Spencer Lee Rogers
Alumni Award Nominee, 2017

Wendy L. Tinsley Becker, RPH, AICP, Principal
Architectural Historian + Urban / Preservation Planner
wendy@urbanapreservation.com

Founding Principal, **Wendy L. Tinsley Becker, RPH, AICP**, brings an expert background in American history, architecture, and urban planning, with a particular emphasis on issues relating to historic preservation. Her experience includes extensive historical resources survey work, design review under *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, single-site historic property research and documentation, and practice in municipal regulatory planning and cultural resources compliance issues including code compliance, revision and review, CEQA, NEPA, and Section 106 of the National Historic Preservation Act. As a preservation-planning consultant she participates in the development and administration of local land use regulations, policies, programs and projects; prepares reports involving research and analysis of various planning issues; conducts site-specific project and design review; and facilitates project coordination between contractors, architects, developers, citizens and other stakeholders. Wendy meets the *Secretary of the Interior's Historic Preservation Professional Qualifications Standards* in the disciplines of History and Architectural History and the *draft standards* established for Historic Preservation and Land Use/Community Planning. She is included on the California Council for the Promotion of History's Register of Professional Historians and also maintains professional certification in the American Institute of Certified Planners (AICP).

Wendy is a co-author and editor of the AICP Certified Urban Designer Exam Study Guide (V1.0) released in March 2016. From 2013 forward she has provided professional training to AICP exam applicants as part of the American Planning Association California Chapter – San Diego Section annual exam training program.

Wendy has assisted municipalities, utility providers, and lead agencies in preservation planning program development and implementation efforts. She regularly consults for private and agency applicants on historical resource and historic property analysis for discretionary projects and undertakings pursuant to Section 106 of the National Historic Preservation Act and the California Environmental Quality Act, as well as Federal Rehabilitation Tax Credit proposals at National Register listed or eligible properties, which are subject to review by the State Office of Historic Preservation and the National Park Service. She was the author / facilitator and lead historic preservation consultant for the City of Chula Vista's award-winning Municipal Preservation Planning Program. She authored the Historic Preservation Element for the City of La Mesa's award winning 2011 / 2030 General Plan update process. She provides survey, architectural history, context development, programmatic agreement, and historic preservation planning consulting services for the Southern California Edison Company including preparation of a programmatic guide for the treatment of all historic-era properties in the company's 55,000 square mile service territory. She served as the lead Architectural Historian for the City and County of Honolulu High Capacity Transit Corridor Project's Kako'o (Section 106 Programmatic Agreement Program manager) consultant team. Wendy's professional analysis and determinations are reviewed for compliance and concurrence by numerous municipalities, and state and federal agencies including the California State Office of Historic Preservation, the California Public Utilities Commission, the USDA Forest Service, the Bureau of Land Management, and the National Park Service.

Her current interests include facilitating approvals for brick and mortar construction and building rehabilitation projects, and working with community-based organizations that emphasize public participation while striving for the improvement of the built environment through good urban and architectural design and associated social programs.

EDUCATION

Master of City Planning,
Preservation & Urban Design Emphasis
San Diego State University

—
Bachelor of Arts – History
San Diego State University

REGISTRATIONS

American Institute of Certified Planners
(#022838)
Register of Professional Historians
(#612)

EXPERIENCE

2005-present: Founding Principal
Urbana Preservation & Planning, LLC

—
2012-present: Faculty Lecturer
San Diego State University
City Planning Graduate Program

—
2006-2017: Faculty Instructor
University of California, San Diego
Urban Planning & Development Program

—
2002-2005: Historian / Planner
Architectural Resources Group

—
2001-2002: Historian / Planner
Historic Research Services

—
2000-2001: Historian
Office of Marie Burke Lia, Esq.

—
1996-1999: Asst. Coordinator +
Researcher:
SHPO/CHRIS
South Coastal Information Center

PROJECT EXPERIENCE*

In-Progress	<i>Post Rock Resources of Kansas National Register Nominations; Lincoln, Mitchell, Rush, and Russell Counties, KS.</i>
In-Progress	<i>USACE Santa Fe Dam Evaluation; Los Angeles, CA.</i>
2021	<i>City of Laguna Beach Preservation 101 Workshop – Staff Training, Laguna Beach, CA.</i>
2021	<i>Post Rock Resources of Kansas Survey and MPDF; Lincoln, Mitchell, Rush, and Russell Counties, KS.</i>
2021	<i>Historic Resource Research Report: 3800 University Ave; San Diego, CA.</i>
2021	<i>860 Muender Ave Historic Integrity Memo; Sunnyvale, CA.</i>
2021	<i>Lafayette Hotel Rehabilitation & Tax Credit Consulting; San Diego, CA.</i>
2021	<i>Old Tavern Rehabilitation & Tax Credit Consulting; Sacramento, CA.</i>
2021	<i>Historic Resource Research Report: 4070-72 Georgia Street; San Diego, CA.</i>
2021	<i>Transmission Line Rating & Remediation Project, Ivanpah Control Line, Archival Research Package, Southern California Edison, Southern California.</i>
2021	<i>528 E. Mission Road Historic Resource Analysis Report; San Marcos, CA.</i>
2021	<i>4055 Lytle Street – Getchell Ranch / The Stone House Historic American Building Record (HABS) Level II Documentation, Fontana, CA.</i>
2021	<i>Norco Egg Ranch Historic American Building Record (HABS) Level II Documentation, Norco, CA.</i>
2021	<i>East Gilman Channel Historic American Engineering Record (HAER) & Monument Consulting, Banning, CA.</i>
2021	<i>5265 N. 4th Street Historical Resource Summary; Irwindale, CA.</i>
2021	<i>Historic Resource Analysis Report: 3611 Hyacinth Drive Historic Designation Package, San Diego, CA.</i>
2021	<i>Historic Resource Analysis Report: 2675 Clove Street Historic Designation Package, San Diego, CA.</i>
2021	<i>Historic Resource Analysis Report: 8301 La Mesa Blvd Historic Assessment; La Mesa, CA.</i>
2021	<i>1033 Pandora Drive Historic Designation; La Mesa, CA.</i>
2021	<i>7345 Remley Place Mills Act Application and Rehabilitation Plan, San Diego, CA.</i>
2021	<i>3629 Front St Mills Act Application and Rehabilitation Plan, San Diego, CA.</i>
2021	<i>Southern California Edison Company Transmission Line Rating and Remediation Program Ivanpah-Control Transmission Corridor, Historic-Era Built Environment Survey Report.</i>
2020	<i>Historic Resource Research Report: Historic Designation & Mills Act Package, 1135 Devonshire Drive, San Diego, CA.</i>
2020	<i>Historic Resource Research Report: Historic Designation Package, 3575 Via Flores, San Diego, CA.</i>
2020	<i>Historic Resource Analysis Report and CA DPR Forms, Archibald and Schaefer RV Park, City of Ontario, CA.</i>
2020	<i>Historic Resource Research Report: Historic Designation & Mills Act Package, 2275 Evergreen Street, San Diego, CA.</i>
2020	<i>Historic Resource Research Report: Historic Designation & Mills Act Package, 9434 Sierra Vista Drive, La Mesa, CA.</i>
2020	<i>Historic Resource Analysis Report: CEQA Evaluation and CA DPR Forms, Mira Loma Quartermaster Depot, Rutan & Tucker, LLP, Jurupa Valley, CA.</i>
2020	<i>Historical Resource Evaluation Memorandum & CA DPR Forms, Ontario RV Storage Mitigated Negative Declaration, Ontario, CA.</i>
2020	<i>Historic Resource Research Report: Historic Designation 1610 Santa Barbara Street, San Diego, CA.</i>
2020	<i>Red Fox Room Retroactive Review, JCG Development, San Diego, CA.</i>

BOARDS + COMMITTEES

Chair / Immediate Past Chair: American Planning Association National Urban Design & Preservation Division, 04/2012-12/2016 — Founder + Volunteer Executive Director / Ex –Officio Director: Built Environment Education Program (BEEP) San Diego, 2008-2015 — Education Committee Member: California Preservation Foundation, 04/2012-04/2014 — Vice-Chair + Newsletter Editor: APA National Urban Design & Preservation Division, 01/2010-03/2012 — Director & Education Chair: San Diego Architectural Foundation, 11/2008- 2011 — Appointed Public Member: City of San Diego Historical Resources Board Incentives Subcommittee, 08/2008- 02/2010 — Advisor/Member – UCSD Extension Advisory Group Urban Planning & Development Certificate Program, 2007 forward — Founding President – Jack London District Association, 2005-2006
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SELECT AWARDS

2016 - Award of Excellence for Preservation Advancement - City of San Diego Historical Resources Board (recognized for Urbana's preservation planning study for the San Diego State Normal School Campus & San Diego City Schools Historic District). — 2014 - American Planning Association (APA) San Diego Chapter – Planning Agency Award for preparation of La Mesa 2030 General Plan. *Historic Preservation Element prepared by WLTB / Urbana.

- 2020 *Rancho Miramonte Section 106 Evaluation: Historic Property Survey Report, U.S. Army Corps of Engineers, Chino, CA.*
- 2020 *Historic Resource Technical Report: 2956 Roosevelt Street, Sterling Corporation, Carlsbad, CA.*
- 2020 *Historic Resource Research Report: Historic Designation & Mills Act Package, 4350 Nabal Drive, La Mesa, CA.*
- 2020 *4630 Date Street Historic Landmark Nomination, La Mesa, CA.*
- 2020 *Avo Theater Rehabilitation Tax Credit Consulting, JCG Development, Vista, CA.*
- 2020 *Southern California Edison Company Transmission Line Rating and Remediation Program Kern River to Los Angeles Transmission Corridor, Historic-Era Built Environment Survey Report.*
- 2020 *Historic Resource Research Report: Historic Designation & Mills Act Package, 1025 Devonshire Drive, San Diego, CA.*
- 2020 *Historic Resource Research Report: Historic Designation & Mills Act Package, "The Muse" 1020 Prospect Street, La Jolla, CA.*
- 2020 *Historic District Nomination Package: Culverwell and Taggarts, City of San Diego, CA.*
- 2020 *Historic District Nomination Package, Arizona Street Tract, Park Villas Subdivision, City of San Diego, CA.*
- 2020 *Historical Resource Analysis Report, Moiola School, Fountain Valley, CA.*
- 2020 *Historical Resource Survey, Proposed Merrill Commerce Center Specific Plan, Ontario, CA.*
- 2020 *Historic Property Survey Report :Evan Hewes Highway and Bridge Evaluation, Imperial County, CA.*
- 2020 *Historical Resource Analysis Report: Historic Designation and Mills Act Application 552 Rushville Street, San Diego, CA.*
- 2019 *Historic Context and Preservation Element Historical Resource Analysis Report / Historic Property Survey Report for Southern California Edison Company Lindsay Substation and Bliss-Lindsay 66kV Sub-Transmission Line.*
- 2019 *To Kalon Vineyard / Robert Mondavi Winery Patent Litigation Expert Witness Consulting, Oakville, CA.*
- 2019 *Historical Resource Analysis Report, Vic Braden Tennis College, 23333 Ave La Caza, Coto De Caza, CA.*
- 2019 *Church of God in Christ Bulletin 580 Package.*
- 2019 *Historical Resource Analysis Report, 7407 Alvarado Road, La Mesa, CA.*
- 2019 *City of Laguna Beach Preservation Ordinance and Program Consulting.*
- 2019 *Historic Resource Research Report and Conditions Consulting, 8445 Avenida de las Ondas, La Jolla, CA.*
- 2019 *Southern California Edison Company Transmission Line Rating and Remediation Program Control-Silver Peak Transmission Corridor, Historic-Era Built Environment Survey Report.*
- 2019 *Southern California Edison Catalina Island Historic-Era Water System Management Program, Catalina Island, CA.*
- 2019 *Historical Resource Analysis Report / Historic Property Survey Report, Southern California Edison Catalina Island Wrigley Pipeline Project, Catalina Island, CA.*
- 2019 *Retroactive Historical Resource Research Report, 31st Street, San Diego, CA.*
- 2019 *Historical Resource Analysis Report / Historic Property Survey Report Southern California Edison Pedley Powerhouse Complex, Norco, California.*
- 2019 *Historical Resource Analysis Report / Historic Property Survey Report Southern California Edison Company Eastern Sierras Transmission System, Mono County and Inyo County, California.*

RELATED EXPERIENCE

- Member: County of San Diego Valle de Oro Community Planning Group, 09/2016 forward —
- Director + Civic Improvement Chair, Grossmont-Mt. Helix Improvement Association, 08/2016 forward —
- Mentor: San Diego State University Aztec Mentor Program, Spring 2016 Cohort —
- Co-Author / Editor: AICP Certified Urban Designer Exam Study Guide, Version 1.0 (released March 2016) —
- AICP Exam Course Speaker: California Chapter, San Diego Section, (annually) 02/2013-present —
- Retreat Facilitator: Beautiful Pacific Beach, Annual Board of Directors Retreat, (annually) 2016-present —
- Invited Panel Speaker: *Density and Design: The Future of Housing in San Diego*, American Planning Association San Diego Section, San Diego, 09/2017 —
- Invited Speaker: *Building Community and Character – Preservation is Place*; 1st Annual Historic Preservation Conference Nebraska State Office of Historic Preservation, Omaha (NE), 06/2013 —
- Panel Speaker: *Preservation Toolkit for Small Cities*, American Planning Association California Chapter Conference, 10/2012 —
- Invited Speaker: *Preliminary Findings – The Status of Preservation Planning Regulatory Programs in the San Diego Region - 2012*, Association of Environmental Professionals San Diego Chapter September Luncheon, 09/2012



- 2019 *Historical Resource Research Report, 3629 Front Street, San Diego, CA.*
- 2019 *Programmatic Agreement Among the Bureau of Land Management – California, the USDA Forest Service, Pacific Southwest Region, California Utility Providers, and the California Office of Historic Preservation, Regarding the Identification, Evaluation, Management, and Exemption of Historic-Era Electrical Infrastructure Facilities in the State of California.*
- 2019 *City of San Diego Clairemont Community Plan Update, Historic Context and Preservation Element.*
- 2019 *Historic Site Report, 10446 Russell Road, La Mesa, CA.*
- 2019 *City of Coronado, As-Needed Historic Research Consulting, Coronado, CA.*
- 2019 *Historical Resource Research Report, 4250-52 Cleveland Ave, San Diego, CA.*
- 2018 *Southern California Edison Company Transmission Line Rating and Remediation Program Control-Silver Peak Transmission Corridor, Historic-Era Built Environment Survey Report – Phase 1 Desk Survey.*
- 2018 *Southern California Edison Company Transmission Line Rating and Remediation Program Control-Haiwee Transmission Corridor, Historic-Era Built Environment Survey Report – Phase 1 Desk Survey.*
- 2018 *Southern California Edison Company Transmission Line Rating and Remediation Program ICKI Transmission Corridor, Historic-Era Built Environment Survey Report – Phase 1 Desk Survey.*
- 2018 *Southern California Edison Company Transmission Line Rating and Remediation Program Eldorado-Lugo-Pisgah Transmission Corridor, Historic-Era Built Environment Survey Report – Phase 1 Desk Survey.*
- 2018 *City of San Diego Park Boulevard Residential Historic District Historic Context Statement and Nomination Package.*
- 2018 *California Department of General Services, Metropolitan State Hospital Project Historical Resource Analysis Report.*
- 2018 *City of San Juan Capistrano, River Street Marketplace Historical Resource Analysis Report.*
- 2018 *Southern California Edison Company Transmission Line Rating and Remediation Program Kern River to Los Angeles Transmission Corridor, Historic-Era Built Environment Survey Report – Phase 1 Desk Survey.*
- 2017 *Historic Site Designation Package, Wexler House 1088 Sierra Vista Avenue, La Mesa, California.*
- 2017 *Nelson-Sloan Otay Rock Plant Property, Chula Vista, California 91910.*
- 2017 *Adams Avenue, Murrieta, California, Tract Map Historical, Cultural, and Paleontological Report.*
- 2017 *4 Greenwood Common (Berkeley Landmark No. 125) Mills Act Application Package, Berkeley, CA.*
- 2017 *Historical Resource Analysis Report, 1201 S. Grand Avenue, Los Angeles, California.*
- 2017 *Design Review Analysis and Historical Resource Research Report, 4884 Marlborough Avenue, San Diego, California.*
- 2017 *Historical Resource Analysis Report / Historic Property Survey Report, SCE MacNeil Substation, Burbank, California.*
- 2017 *Peer Review Statement, 400 S. Alameda Street, Los Angeles, California.*
- 2017 *4617-4619 and 4621-4625 Park Boulevard, San Diego, California, Historical Resource Technical Report.*
- 2017 *Historical Resource Research Report, 707 17th Street, San Diego, California.*
- 2017 *5064 Lotus Street, San Diego, California, Historical Resource Technical Report.*
- 2017 *Historical Resource Technical Report, 550 Sicard Street, San Diego, California.*

SELECT AWARDS (CONT.)

- 2013 – American Planning Association National Division Executive Committee Recipient – Division Achievement Award (*recognized for professional development webinars on historic preservation, urban design, and development topics developed on behalf of the APA Urban Design & Preservation Division*).
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- 2012 - American Association of Environmental Professionals San Diego Chapter – *Outstanding Planning Document Award for preparation of the City of Chula Vista Historic Preservation Program & Ordinance.* *Historic Preservation Ordinance & Program prepared by WLTB / Urbana.
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- 2012 - American Planning Association National Division Executive Committee Recipient – Education Excellence Award (*recognized for education efforts on behalf of the APA Urban Design & Preservation Division*).
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- 2011 - American Planning Association National Division Executive Committee Recipient Branding Award (*recognized for visibility, outreach, and education efforts on behalf of the APA Urban Design & Preservation Division*).
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- 2010 - Award of Excellence in Education - City of San Diego City Planning & Community Investment Department Historical Resources Board (*recognized for the Built Environment Education Program developed for the San Diego Architectural Foundation / BEEP San Diego*).
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- 2009 - San Diego Public Library Foundation / Friends of the San Diego Public Library 2008-2009 Chapter Volunteer Award, University Heights Branch (*recognized for preservation planning work at the historic San Diego State Normal College campus*).

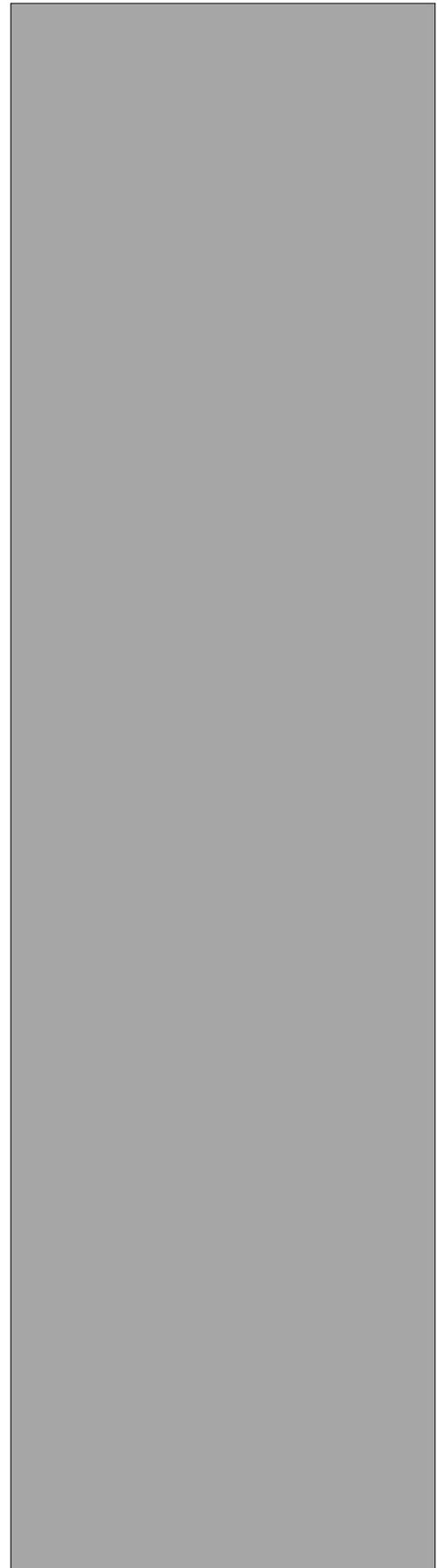
- 2017 *Historic Landmark Designation Package, 9415-9425 Eldorado Lane, La Mesa, California.*
- 2017 *6035 University Avenue, San Diego, California, Historical Resource Technical Report.*
- 2016 *Expert Witness Consulting, Bernati Ticino Trust v. City of San Diego*
- 2016 *4365-4369 Ohio Street, San Diego, California, Historical Resource Technical Report.*
- 2016 *4505 Park Boulevard, San Diego California, Historical Resource Technical Report.*
- 2016 *Designation and Mills Act Rehabilitation Reporting and Consulting for the Edwin K. Hurlbert House, 2930 Chatsworth Boulevard, San Diego, CA.*
- 2016 *NHPA Section 106 Historic Property Analysis and Findings of Effect Statement for the Southern California Yeshiva High School, San Diego, CA.*
- 2016 *Peak Valley Solar Farm CEQA Cultural Resources Analysis (Historical Resources, Cultural Resources, and Paleontological Resources), San Bernardino County, CA.*
- September 2016 *City of Oceanside / Caltrans, Coast Highway (Hill Street) Bridge over the San Luis Rey River Replacement Project Historical Resources Evaluation Report, Oceanside, CA.*
- August 2016 *Historical Resource Technical Report – 715 Muirlands Vista Way, La Jolla, CA.*
- June 2016 *Class III Cultural Resources Inventory / NRHP Eligibility Determination, SCE Eldorado 500kV Transmission System, California, Arizona, Nevada.*
- June 2016 *Casa de las Flores Property Carriage House / Garage Building, Historical Resource Analysis Report, Chula Vista, CA.*
- May 2016 *Historic American Engineering Record (HAER) No. CA-167-O – Southern California Edison Company Big Creek Hydroelectric System Vincent 220kV Transmission Line, Kern, Fresno, and Los Angeles Counties.*
- May 2016 *San Diego Gas & Electric Company Eastern Division Property Eligibility Review Memo, El Cajon, CA.*
- March 2016 *Historical Resource Review - 1347-1349 Locust Street, Walnut Creek, CA.*
- March 2016 *City of La Mesa Collier Park NHPA Section 106 Review, La Mesa, CA.*
- March 2016 *Redwood Solar Farm 4 CEQA Cultural Resources Analysis (Historical Resources, Cultural Resources, and Paleontological Resources), Kern County, CA.*
- March 2016 *City of La Mesa Vista La Mesa Park NHPA Section 106 Review, La Mesa, CA.*
- February 2016 *City of Chula Vista Third Avenue Community Character + Business Improvement Guidelines.*
- February 2016 *City of San Diego HRB No. 461 / Anderson House, San Diego County Historic Site Designation and Mills Act Rehabilitation Consulting, 3841 Sweetwater Road, Bonita, CA.*
- January 2016 *Historic American Landscapes Survey (HALS) No. CA-122 – Collier Park, La Mesa, CA.*
- December 2015 *Historic American Engineering Record (HAER) No. CA-2138 – Southern California Edison Company Substations: Monumental Type, Santa Barbara, Kern, Fresno, and Los Angeles Counties.*
- December 2015 *Pacific Gas & Electric Company South of Palermo Project Historical Resource Analysis Report / Historic Property Survey Report.*
- November 2015 *Historic American Engineering Record (HAER) No. CA-167-N – Amendment to Southern California Edison Company Big Creek Hydroelectric System East & West Transmission Line.*
- November 2015 *Designation and Mills Act Rehabilitation Reporting and Consulting for the Alexander Schreiber Spec House No. 1 / Payne House, 1429 Dale Street, San Diego, CA.*

RELATED EXPERIENCE (CONT.)

- Attendee: National Charrette Institute, *Introduction to Dynamic Planning* (Level 1 NCI Charrette Manager Certification Training), San Diego (CA) 10/2003
- Attendee: CA Preservation Foundation, *Incentives for Historic Preservation Projects*, Berkeley (CA) 09/2003
- Attendee: University of Southern CA, *Preservation Planning & Law*, Los Angeles (CA) 07/2003
- Attendee: League of CA Cities, *Smart Growth Zoning Codes*, Lodi (CA) 12/2002
- Invited Participant: *Second Natures, Redefining the Los Angeles Riverfront*, Los Angeles (CA) 01/2002 (2-Day Planning & Design Charrette hosted by MOCA & The Geffen)
- Selected Smart Growth Researcher: San Diego State University Foundation & City Planning Graduate Program, Dr. Roger Caves, 01/2001 – 08/2001 (Grant Topic: Planning for Sprawl in the U.S)
- Attendee: *Section 106 An Introductory Course*, National Preservation Institute, San Francisco (CA) 04/1999
- COURSES CREATED & TAUGHT**
- BUSA 40687 - Historic Preservation Planning (UCSD 2006-2012)
- BUSA 40515 - Fundamentals of City Planning (UCSD 2007)
- BUSA 40748 - Foundations of Urban Planning & The Built Environment (UCSD 2009-2012)
- BUSA 40749 - Functions & Processes of City Planning (UCSD 2011-2012)
- ART 40436 - American Architectural History I & II (UCSD 2008-2014)
- CP 670 - History of Urban Planning (SDSU 2012)

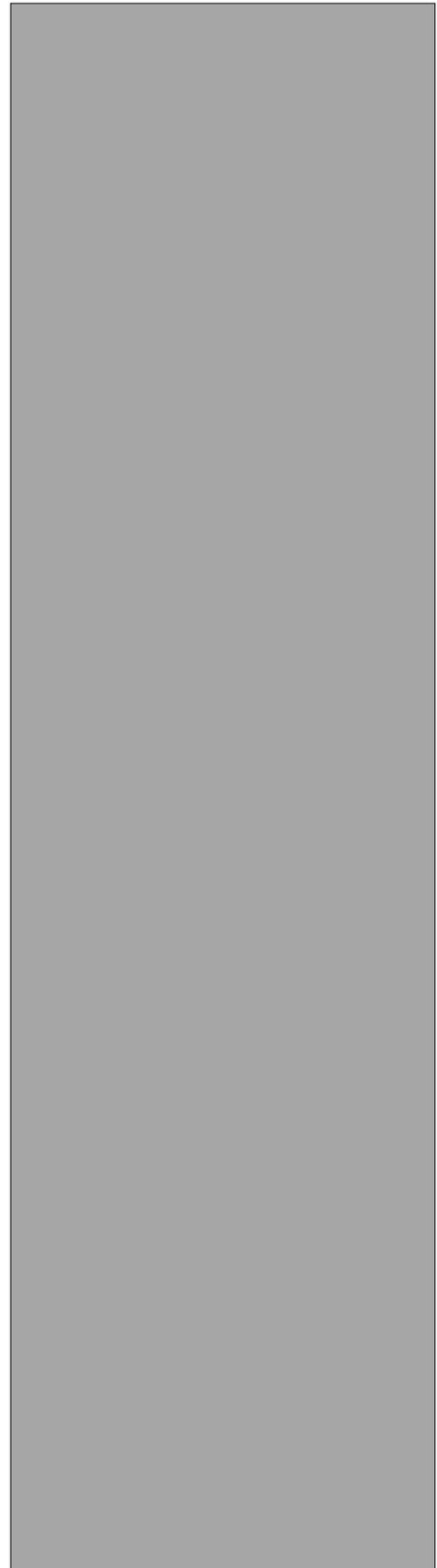


- October 2015 *Designation and Mills Act Rehabilitation Reporting and Consulting for the Florence Palmer Spec. House II of III, 350 Fern Glen, San Diego, CA.*
- May 2015 *Historic-era Electrical Infrastructure Management Program: A Program for the Identification, Review, Exemption, and Treatment of Generating Facilities, Transmission Lines, Sub-transmission Lines, Distribution Lines, and Substations within the Southern California Edison Company's Service Territory.*
- March 2015 *Class III Cultural Resources Inventory for Southern California Edison's Coolwater-Lugo Transmission Project, San Bernardino County, California – Volume 1: Historic-Era Built Environment Survey Report.*
- 2014-2015 *Los Angeles Regional Intercommunications System NHPA Section 106 Assessment of 125 sites located throughout Los Angeles County.*
- 2014 *Historic Preservation and Urban Planning Expert Witness, Brandon Milan v. City of San Diego, State of California Superior Court Case No. 37-2013-00067039-CU-EI-CTL.*
- 2013-2014 *Historic Preservation and Urban Planning Expert Witness, Edward Valerio v. City of San Diego, U.S.D.C. Case No. 12C1200W (WMC)*
- November 2014 *Historic-Era Built Environment Survey Report, NRHP / CRHR Eligibility Evaluations, and Concurrence Consulting for proposed Coolwater Lugo Transmission Project (approx. 200 built environment sites over 13 segments in the vicinity of Apple Valley, Barstow, and Hesperia, California).*
- November 2014 *Herald Examiner Building, 1101-1139 S. Broadway, Los Angeles, CA, Historic Preservation Certification Application: Part 1 – Determination of Eligibility – Draft Submittal.*
- November 2014 *Cecil Hotel Building, 640 Main Street, Los Angeles, CA, Historic Preservation Certification Application: Part 1 – Determination of Eligibility – Draft Submittal.*
- November 2014 *Cecil Hotel Building, 640 Main Street, Los Angeles, CA, City of Los Angeles Historic Cultural Monument Application Package – Draft Submittal.*
- November 2014 *Historic-Era Electrical Infrastructure Management Program: A Program for the Identification, Review, Exemption, and Treatment of Generating Facilities, Transmission Lines, Sub-transmission Lines, Distribution Lines, and Substations within the SCE Service Territory.*
- October 2014 *Commercial Exchange Building, 416 W. 8th Street, Los Angeles, CA, Historic Preservation Certification Application: Part 2 – Description of Rehabilitation – Draft Submittal.*
- October 2014 *NRHP / CRHR Eligibility Review, SCE Lighthipe and Laguna Bell Substations, Long Beach and Commerce, California.*
- October 2014 *NRHP / CRHR Eligibility Review, SCE Eagle Rock Substation, Los Angeles, California.*
- October 2014 *NRHP / CRHR Eligibility Review, SCE Colton Substation, Colton, California.*
- September 2014 *City and County of Honolulu Little Makalapa National Register of Historic Places Nomination Peer Review.*
- September 2014 *City and County of Honolulu Big Makalapa National Register of Historic Places Nomination Peer Review.*
- September 2014 *Sudberry Properties Strawberry Fields Historic Cultural Landscape Analysis Report, Chula Vista, CA.*
- July 2014 *Friday Morning Club Building, 938 S. Figueroa, Los Angeles, CA, Historic Preservation Certification Application: Part 2 – Description of Rehabilitation – Draft Submittal.*
- May 2014 *Commercial Club of Southern California Building / Case Hotel Part 2 Determination of Eligibility, Los Angeles, CA.*
- May 2014 *City and County of Fresno Tertiary Treatment and Disinfection Facility – Plant 2 NHPA Section 106 and CEQA Historical Resource Assessment.*

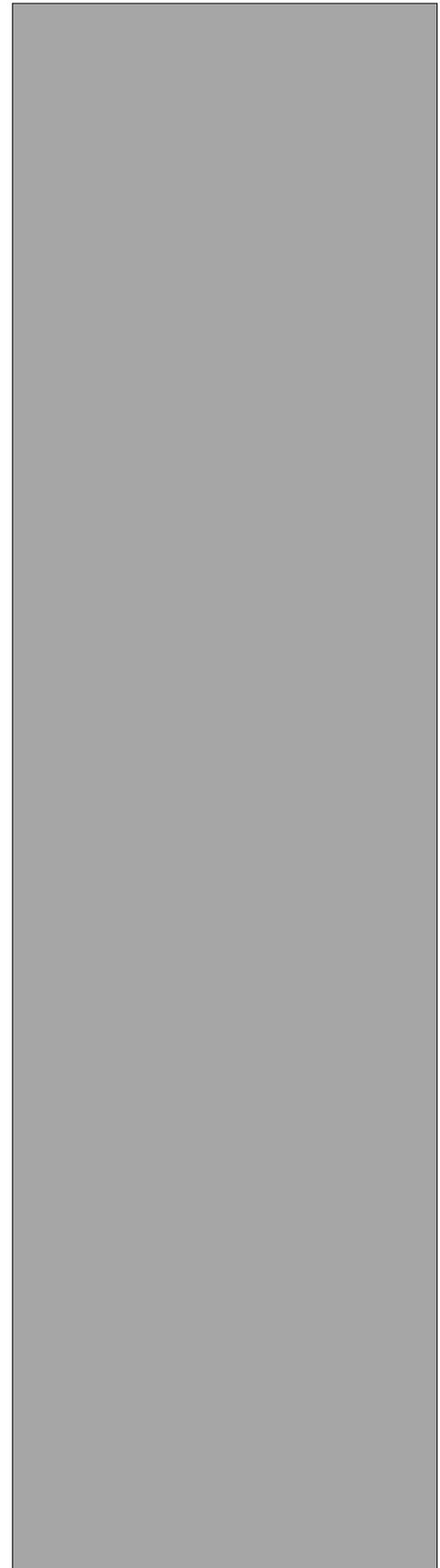




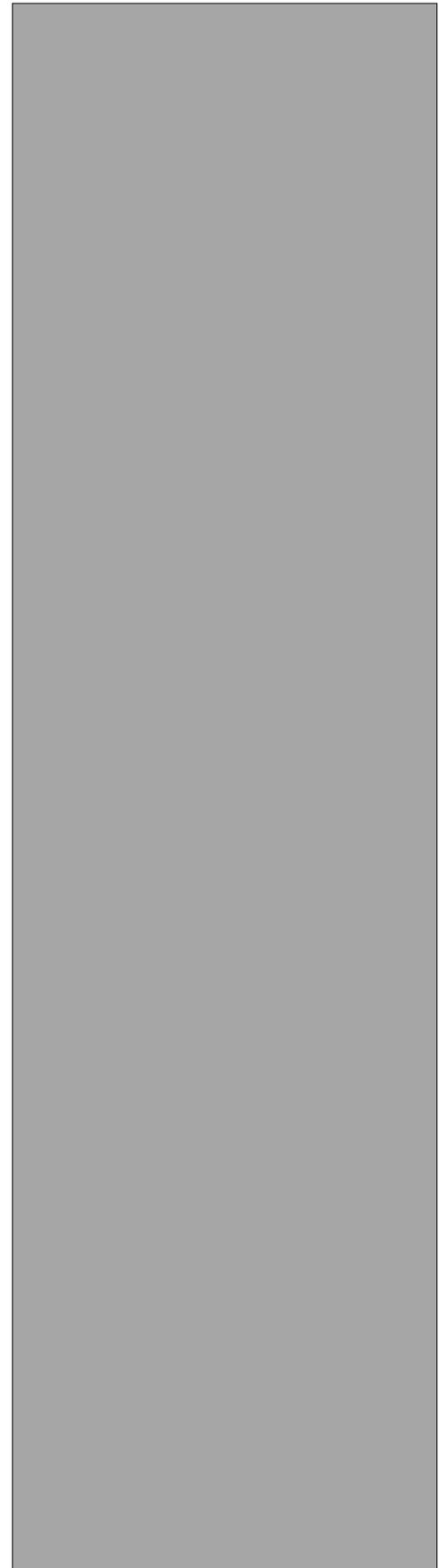
- April 2014 *City and County of Honolulu Aloha Stadium Station Project Treatment Plan Peer Review, Honolulu, CA.*
- April 2014 *Redwood Solar Farm Historic Property Survey / Historical Resource Report, Kern County, CA.*
- April 2014 *4th@ Broadway EIR Mitigated Negative Declaration – Historical Resource Assessment Report, Los Angeles, CA*
- March 2014 *Commercial Club of Southern California Building / Case Hotel Part 1 Determination of Eligibility, Los Angeles, CA.*
- February 2014 *Commercial Club of Southern California Building / Case Hotel Historic Cultural Monument Application, Los Angeles, CA.*
- January 2014 *1560 S. Escondido Boulevard NHPA Section 106 Review and Concurrence Consulting.*
- November 2013 *Consulting for Two Historic House Relocations to the City of San Diego Development Services Department, Public Works Department, and City Attorney’s Office.*
- September 2013 *Caltrans Section 106 Historic Property and CEQA Historical Resource Survey – Gilbert Street, Santa Ana, CA.*
- October 2013 *NHPA Section 106 Historic Property and CEQA Historical Resource Survey Report, Proposed Coolwater Lugo Transmission Project.*
- June 2013 *Historic Agricultural Landscapes of Visalia and Tulare County electronic book and exhibit – Tulare County Museum of Farm Labor and Agriculture, Visalia, CA*
- January 2013 *National Park Service Historic American Engineering Record (HAER) Level II Documentation (Large Format Negative Photography & Narrative) – Big Creek Hydroelectric System East & West Transmission Line, Fresno to Los Angeles, CA*
- January 2013 *Historical and Architectural Eligibility Evaluation of Delano Substation Complex.*
- October 2012 *Historical and Architectural Eligibility Evaluations of the Southern California Edison Company Historic-Era Casitas, Santa Barbara, Carpinteria, Santa Clara, and Goleta Substations*
- October 2012 *City and County of San Francisco, 2419-2435 Lombard Street Historical Resource Evaluation Report.*
- 2011-2013 *Historic Preservation Expert Witness, Academy of Our Lady of Peace v. City of San Diego, U.S.D.C. Case No. 09CV0962 WQH (MDD)*
- In-process *San Diego Municipal Anglers Building Historical Resource Designation Report, San Diego, CA*
- July 2012 *National Park Service Historic American Engineering Record (HAER) Level II Documentation (Large Format Negative Photography & Narrative) – SCE San Joaquin Cross Valley Loop Project, Visalia, CA*
- June 2012 *Historic Structure Report - Casa Peralta, 384 West Estudillo Avenue, San Leandro, CA*
- June 2012 *County of San Diego Historic Site Designation Report, John N. Mortenson’s Hines Residence, Mt. Helix, CA*
- April 2012 *NHPA Section 106 Review, Lodi Municipal Stadium, Lodi, CA*
- March 2012 *Federal Rehabilitation Certification Application – Part 3 Request for Certification of Completed Work – Imig Manor / Lafayette Hotel, 2223 El Cajon Boulevard, San Diego, CA*
- February 2012 *National Register of Historic Places Nomination, Imig Manor / Lafayette Hotel, 2223 El Cajon Boulevard, San Diego, CA*
- February 2012 *Sequoia National Forest Electric Power Conveyance Systems NRHP Eligibility Evaluations, Tulare County, CA*
- January 2012 *NHPA Section 106 Review, La Mesa Youth Center, La Mesa, CA*



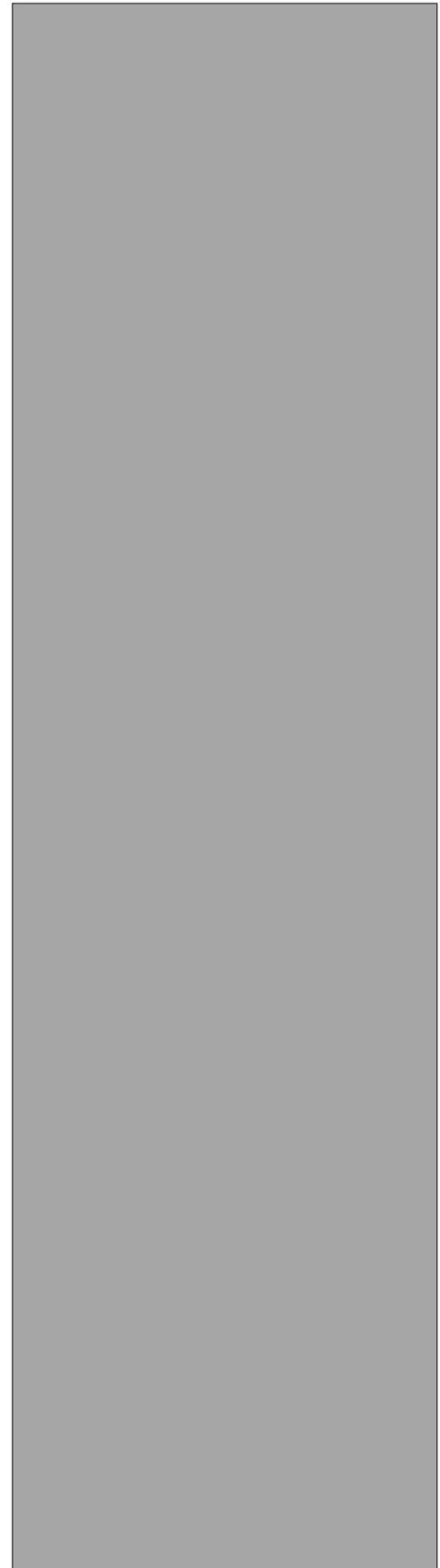
- December 2011 *City of La Mesa 2012 General Plan Update – 2030 Historic Preservation Element, La Mesa, CA*
- December 2011 *Crown City Medical Center EIR Historical Resource Initial Study, Pasadena, CA*
- November 2011 *NHPA Section 106 Review, 4470 Acacia Avenue, La Mesa, CA*
- September 2011 *Big Creek Hydroelectric System Historic District Vincent 220kV Transmission Line NRHP Eligibility Evaluation and Historic Property Treatment Plan.*
- July 2011 *Historic-Era Electric Power Conveyance Systems Programmatic Agreement (SCE, BLM, & CA, NV SHPO) (Context, Typology, Identification, Integrity Qualifications, & Treatment Processes)*
- June 2011 *Aesthetic impact Analysis Report, Hollywoodland Historic Rock Retaining Walls, Los Angeles, CA*
- April 2011 *Kern River – Los Angeles 60 / 66kV Transmission Line NRHP Eligibility Evaluation, Kern & L.A. Counties*
- December 2010 *Historic Structure Report - Linda Vista Federal Defense Housing Project Tenant Activity Building, San Diego, CA*
- October 2010 *City of San Diego Redevelopment Agency, Historic Property / Historical Resource Analysis Report of the Linda Vista Federal Defense Housing Project Tenant Activity Building, San Diego, CA*
- November 2010 *Historic Designation Report, Burt F. Raynes Residence, 299 Hilltop Drive, Chula Vista, CA*
- August 2010 *Southern California Edison Company Tehachapi Renewable Transmission Project Antelope-Vincent No. 1 220kV Transmission Line NRHP/CRHR Review*
- July 2010 *Southern California Edison Company Tehachapi Renewable Transmission Project Rosamond Substation NRHP/CRHR Review, Montebello, California*
- July 2010 *Southern California Edison Company Tehachapi Renewable Transmission Project Antelope-Mesa 220kV Transmission Line NRHP/CRHR Review*
- June 2010 *Southern California Edison Company Tehachapi Renewable Transmission Project Chino-Mesa 220kV Transmission Line NRHP/CRHR Review*
- June 2010 *Southern California Edison Company Tehachapi Renewable Transmission Project Chino Substation NRHP/CRHR Review, Chino, California*
- April 2010 *Historical Resource Analysis Report, Hollywoodland Historic Rock Retaining Walls, Los Angeles, CA*
- March 2010 *Imig Manor/ Lafayette Hotel Part 2 20% Federal Rehabilitation Tax Credit Application*
- January 2010 *CEQA Historical Resource Analysis Report, 2629 National Avenue, San Diego CA*
- December 2009 *City of Santa Ana Warner Avenue Transportation Study Historical Resource Survey, Santa Ana, CA*
- December 2009 *Proposed Heidi Square Redevelopment Project – Project Management, Preservation Planning & Subdivision Re-Design Consulting, San Lorenzo, CA*
- November 2009 *City of San Diego Redevelopment Agency, Historical Resource Review of 4102-4122 University Avenue, San Diego, CA*
- November 2009 *CEQA Historical Resource Analysis Report, 7195 Country Club Drive, La Jolla, CA*
- November 2009 *Imig Manor/ Lafayette Hotel Part 1 20% Federal Rehabilitation Tax Credit Application*
- August 2009 *CEQA Historical Resource Analysis Report, 5511 Calumet Avenue, La Jolla, CA*
- August 2009 *Preservation Planning Study, Site Development, & Rehabilitation Analysis of the Herman Hotel Carriage House, Chula Vista, CA*



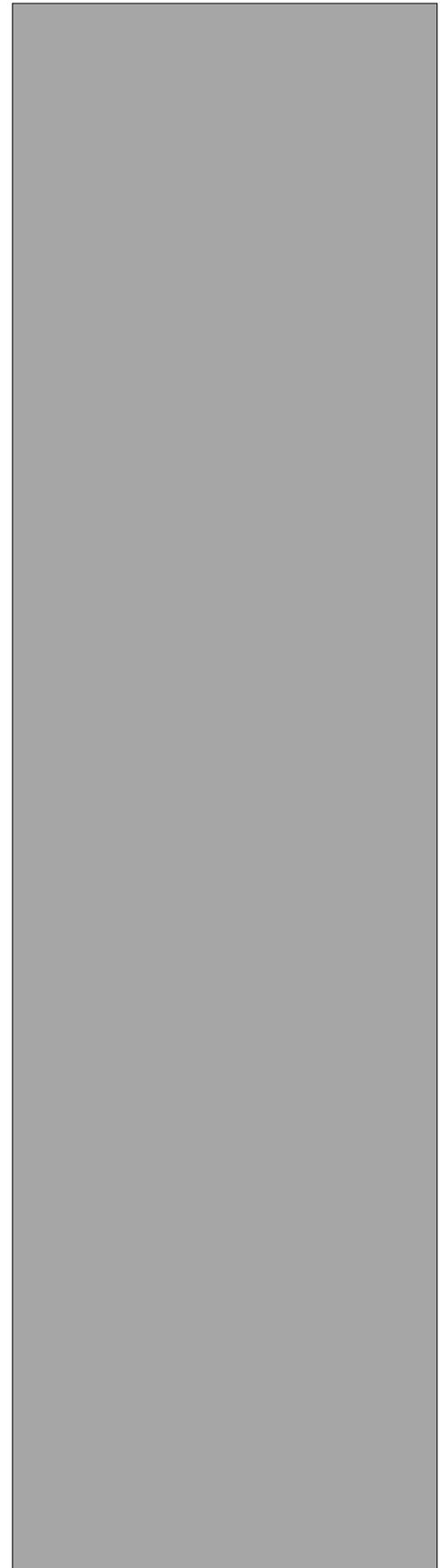
- August 2009 *Historical Site Designation, Design Review, & Mills Act Property Tax Consulting for the Dennstedt Building Company's Calavo Gardens Queen Avenue Dwelling, Mt. Helix, CA*
- August 2009 *CEQA and NHPA Section 106 Review of the Nike Missile Defense System - LA - 14/29 Commemorative Site, unincorporated Los Angeles, CA*
- July 2009 *Code Compliance & Resource Review, 2341 Irving Avenue, San Diego, CA*
- July 2009 *City of Santa Ana Bristol & 17th Transportation Study Historical Resource Survey, Santa Ana, CA*
- May 2009 *Fresno Unified School District Historical Resource Survey of the Proposed M-4 Site, Fresno, CA*
- May 2009 *Section 106 Review of Casa Blanca – 716 Santa Clara Avenue, Alameda, CA*
- April 2009 *Design Review Analysis for the 2110 Glenneyre Street Property, Laguna Beach, CA*
- April 2009 *Section 106 Review of the Fairfax Theatre, Oakland, CA*
- March 2009 *National Register of Historic Places Documentation & Eligibility Evaluation for the Middle Fork American River Hydroelectric Project, Placer County, California*
- February 2009 *Historical Resource Analysis Report & Design Review – 337 Hawthorne Road, Laguna Beach, CA*
- February 2009 *San Diego Normal School Campus Phase I Preservation Planning Study & Historical Resource Survey, San Diego, CA*
- January 2009 *Historical Resource Analysis Report, 634 2nd Avenue, Chula Vista, CA*
- October 2008 *Pier 29 National Historic Preservation Act Finding of Effects Statement, San Francisco, CA*
- 2007-2008 *Lead Consultant – City of Chula Vista Historic Preservation Program Development – City of Chula Vista Historic Preservation Program Binder (ordinance, historic inventory database, historical overview statement, incentives, project review process and related permit application and processing forms*
- August 2008 *Mayor John Gill Residence, Designation, Mills Act & Rehabilitation Consulting, San Leandro, CA*
- July 2008 *California Portland Cement Company P&H Excavators #3 & #4 Historic Context Statement & California Register Eligibility Review, Mojave, CA*
- July 2008 *Historic Context Statement – Bean Springs Site, Rosamond, CA*
- June 2008 *Cultural Resource Report & Regulatory Review, PL-SCE-Tehachapi-10H, Acton, CA*
- May 2008 *Historical Resource Documentation & Review, San Diego Aqueduct, San Diego, CA*
- April 2008 *Historic Site Designation & Mills Act Historic Property Tax Consulting for the Goldberg Residence, 4654 Iowa Street, San Diego, CA*
- April 2008 *Storefront Improvement / Façade Revitalization Historical Resource Analysis & Design Review Assistance, 3201 Adams Avenue, San Diego, CA*
- March 2008 *Lombardi Ranch CEQA Review, San Ardo, California*
- February 2008 *Del-Sur Saugus Mining Complex Historical Resource Review, Grass Valley, CA*
- February 2008 *Foothill Ranch Historical Resource Review, Palmdale, CA*
- January 2008 *Section 106 Review 1425-1475 South Main Street, Walnut Creek, CA*
- January 2008 *Historic Site Designation Report & Mills Act Property Tax Consulting - Ocean Beach Cottage Emerging Historic District Contributor, 4670 Del Monte Ave., San Diego, CA*
- November 2007 *Historic Site Designation & Mills Act Historic Property Tax Consulting for the Olmstead Building Company's Calavo Gardens Project #531, Mt. Helix, CA*
- October 2007 *Southern CA Edison Company's Del Sur-Saugus Transmission Line Historical Resource Review, Lancaster - Palmdale, CA*



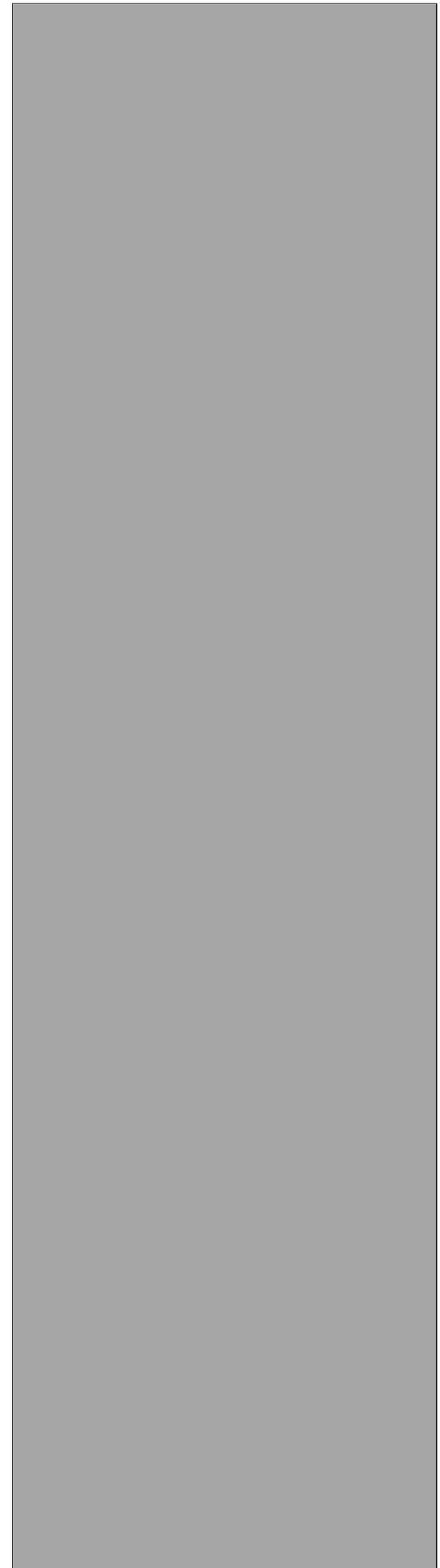
- October 2007 *Southern CA Edison Company's Antelope Substation Historical Resource Review, Lancaster, CA*
- September 2007 *Historical Resource Review & Data Responses for the Proposed SDG&E Orange Grove Energy Project in Pala, CA*
- September 2007 *SCE Kaiser Pass Cabin Historic Property Assessment, Fresno Co., CA*
- August 2007 *USDA Forest Service Meeks Creeks Bridge Assessment, Lake Tahoe, CA*
- July 2007 *Historical Resource Analysis Report, 433 W. Meadow Drive, Palo Alto, CA*
- May 2007 *Historic Preservation Assessment & New Project Planning and Design Consulting – 3994 Jackdaw Street, San Diego (CA)*
- February 2007 *419 Park Way Historical Resource Analysis Report, Chula Vista, CA*
- January 2007 *Upper Triangle Areas Historic Property Survey (Historic Context Statement and Architectural/Historical Documentation of 50 Properties over 15 City Blocks), Fresno, CA*
- December 2006 *Historic Site Designation & Mills Act Historic Property Tax Consulting for the Charles Wakefield Cadman Residence, Mt. Helix, CA.*
- November 2006 *Historical Resource Analysis of the 4303 Narragansett Avenue Property, San Diego, CA*
- September 2006 *Section 106 Review of the 1333 Balboa Street Property, San Francisco, CA*
- September 2006 *Section 106 Review of the Historic Delta-Mendota Canal, Los Banos, CA*
- August 2006 *Historical Evaluation Report – 2959 East Avenue, Hayward, CA*
- June 2006 *Historical Resource Analysis Report: 418-450 10th Avenue Properties, San Diego, CA*
- May 2006 *Section 106 Review of the Coconut Grove Building – Santa Cruz Beach Boardwalk, Santa Cruz, CA*
- May 2006 *Historical Resource Evaluation Report for the 70 15th Street Warehouse, San Diego, CA*
- April 2006 *Historic Site Designation Report & Mills Act Property Tax Consulting - Ocean Beach Cottage Emerging Historic District Contributor, 4528 Saratoga Avenue, San Diego, CA*
- March 2006 *City of Fresno Arts-Culture District Historic Property Survey (Historic Context Statement and Architectural/Historical Documentation of 90-100 Properties over 18 City Blocks), Fresno, CA*
- March 2006 *South Mossdale Historic-Era House Evaluation, Lathrop, CA*
- February 2006 *Westwind Barn Historic Preservation Study, Los Altos Hills, CA*
- January 2006 *Section 106 Review of the 2654 Mission Street Property, San Francisco, CA*
- January 2006 *Section 106 Review of the 325 Mowry Avenue Property, Fremont, CA 94536*
- January 2006 *Section 106 Review of Ardenwood 34551 Ardenwood Bouevard, Fremont, CA 94555*
- December 2005 *Section 106 Review of the 1230 N Street Property, Sacramento, CA 95814*
- December 2005 *Section 106 Review of the Sacramento City College Water Tower, Sacramento, CA*
- November 2005 *Section 106 Review of Fair Oaks Watts, 525 La Sierra Drive, Sacramento, CA*
- November 2005 *Napa Valley College Bus Shelter West Historical Resource Analysis Report, Napa, CA*
- October 2005 *Section 106 Review of the 1025 3rd Street Property, Sacramento, CA 95818*
- September 2005 *City of Davis, Historic Anderson Bank Building Research, Documentation & Design Review Analysis, 203 G Street, Davis, CA*
- September 2005 *Historical Resource Analysis Report, 1212 & 1214 Second Street, San Rafael, CA*



- August 2005 *Historical Resource Analysis Report – Somky Property/Thompson’s Soscol Ranch, Napa, CA 94558*
- July 2005 *Walnut Creek Women’s Club Environmental Impact Report, 1224 Lincoln Avenue, Walnut Creek, CA*
- June 2005 *Tam Property Lot Split Historic Preservation Consulting, Castro Valley, CA*
- May 2005 *Historical Resource Analysis Report, 7329-7331 Eads Avenue, San Diego, CA*
- March 2005 *Ehlers Estate Historical Resource Analysis, 3222 Ehlers Lane, St. Helena, CA*
- March 2005 *University of CA at Santa Cruz Preservation Consulting (Campus Wide Cultural Resources Inventory, Historic Context Statement – Campus Planning History)*
- February 2005 *Hall Winery Historical Resource Analysis, St. Helena, CA*
- January 2005 *Historical Resource Evaluation, 700 28th Avenue, San Mateo, CA*
- January 2005 *Historical Resource Evaluation, 312 & 318 Highland Avenue, San Mateo, CA*
- December 2004 *San Mateo Motel Historical Resource Report – Park Bayshore Townhomes – Environmental Impact Report (Revised February 2005)*
- November 2004 *Historical Evaluation of the San Mateo Motel, 801 South Bayshore Boulevard, San Mateo, CA*
- October 2004 *Stonegate Homes Subdivision Plan, and Single-and-Multi-Family Dwellings Design Review, San Mateo, CA*
- September 2004 *University of CA at Santa Cruz, Getty Campus Heritage Grant Application*
- September 2004 *City of Riverside Downtown Fire Station No.1 Cultural Resources Analysis, Riverside, CA*
- August 2004 *Residential Remodel Design Review – Glazenwood Historic District Contributor, 929 Laurel Avenue, San Mateo, CA*
- August 2004 *Odd Fellows Hall, Historic Structure Report, 113 South B Street, San Mateo, CA (with Conservator Seth Bergstein)*
- July 2004 *Design Review Analysis – Schneider’s Building, 208 East Third Street, San Mateo, CA 94401*
- July 2004 *Embarcadero Cove Development Project Initial Study – Preliminary Historical Resource Analysis, Oakland, CA 94606*
- July 2004 *Historical Resource Evaluation Report – 4830 Cape May Avenue, San Diego, CA 92107 (Revised January 2005)*
- June 2004 *City of Monterey Alvarado Street Mixed-Use Project - APE Survey, Monterey, CA*
- June 2004 *City and County of San Francisco Historical Resource Evaluation Report – 450 Frederick Street, San Francisco, CA 94117*
- June 2004 *Design Review Analysis – 117 Clark Drive, San Mateo, CA 94402*
- May 2004 *Historical Evaluation of the 426 Clark Drive Residence, San Mateo, CA 94402*
- April 2004 *City and County of San Francisco Historical Resource Evaluation Report – 1272 42nd Avenue, San Francisco, CA 94122*
- April 2004 *City of Fresno Broadway Row Historical Resource Survey, Fresno, CA*
- March 2004 *Historical Evaluation of the 117 Clark Drive Residence, San Mateo, CA 94402*
- March 2004 *Historical Evaluation of The Fresno Republican/McMahan’s Building, 2030 Tulare Street, Fresno, CA 93721*
- February 2004 *Crocker Bank Building Preservation Planning Considerations Memorandum*
- January 2004 *Historical Evaluation of the 501 Walnut Street Residence, San Carlos, CA 94070*
- January 2004 *Historical Evaluation of the 20 Madison Avenue and 29 Hobart Avenue Properties, San Mateo, CA 94402*
- January 2004 *Historical Evaluation of The Residence Located At 571 Valley Street, San Francisco, CA*
- January 2004 *Historical Evaluation of the 3925 20th Street Residence, San Francisco, CA 94131*



- November 2003 *Historical Evaluation of Commercial Building Located at 1022 El Camino Real, San Carlos, CA*
- November 2003 *Peer Review Statement for the K & T Foods Building, 451 University Avenue, Palo Alto, CA*
- November 2003 *Historical Evaluation of the Greer-O'Brine Property, 51 Encina Avenue, Palo Alto, CA,*
- November 2003 *Embarcadero Hotel Environmental Impact Report, Historical Resources Analysis and Design Review Statement*
- October 2003 *City of San Leandro Historical Resources Survey, Historic Context Statement, Historic Preservation Ordinance, and Draft Historic Preservation Benefits/Incentive Program*
- August 2003 *Palm Theater Environmental Impact Report, Historical Resources Analysis*
- July 2003 *Historical Evaluation of The First Christian Church Building, 2701 Flores Street, San Mateo, CA 94403*
- June 2003 *Alameda Naval Air Station Reuse Project Historic Preservation Regulatory and Policy Memorandum (Prepared for Alameda Point Community Partners-Master Developer for NAS Alameda)*
- May 2003 *Historical Evaluation of The Residence Located At 606 Dorchester Road, San Mateo, CA*
- March 2003 *Ames Aeronautical Laboratory 40' x 80' Wind Tunnel National Register Nomination (Prepared for NASA Ames Research Center)*
- March 2003 *Ames Aeronautical Laboratory 6' x 6' Supersonic Wind Tunnel National Register Nomination (Prepared for NASA Ames Research Center)*
- March 2003 *Ames Aeronautical Laboratory Administration Building National Register Nomination (Prepared for NASA Ames Research Center)*
- March 2003 *Historical Evaluation of The Residence Located At 1015 South Grant Street, San Mateo, CA*
- February 2003 *8th & Market, 10 United Nations Plaza, Cell Site Impact Review, San Francisco, CA*
- February 2003 *Existing Conditions and Subdivision Design Alternatives for The Proposed Hayman Homes Tract No. 7267, Proctor Road, Castro Valley, CA*
- February 2003 *Historical Evaluation of The Residence Located At 336 West Poplar Avenue, San Mateo, CA*
- January 2003 *Historical Evaluation of The Residence Located At 744 Occidental Avenue, San Mateo, CA*
- January 2003 *Historical Evaluation of the 131 and 141 West Third Avenue Apartment Buildings, San Mateo, CA*
- December 2002 *CA State Capitol Building, Historical Resource Review, Sacramento, CA*
- November 2002 *Wireless Antenna Site Review, Medical Arts Building, 2000 Van Ness Avenue, San Francisco, CA*
- October 2002 *Historical Evaluation of The LeDucq Winery Estate, 3222 Ehlers Lane, St. Helena, CA 94574 (Revised June 2003)*
- October 2002 *Historical Assessment of The St. Patrick's Parish Community Building Located At 3585 30th Street, San Diego, CA, 92104*
- September 2002 *Historical Assessment of The Building Located At 4257 Third Street, San Diego, CA,*
- April 2002 *Historical Assessment of The Building Located At 3567 Ray Street, San Diego, CA,*
- October 2001 *Historical Assessment of The Gustafson's Furniture Building Located At 2930 El Cajon Boulevard, San Diego, CA, 92104*
- September 2001 *Historical Review of Lots A, B, K & L, Block 93, Horton's Addition Lockling, San Diego, CA*
- August 2011 *El Cortez Hotel Part 3 - Request for Certification of Completed Work*



- August 2001 *Core Inventory of All Sites Appearing to Be More Than 45 Years of Age Not Previously Documented* (Prepared For Centre City Development Corporation)
- August 2001 *Urbana Project Abstract Bibliography* (Prepared for Dr. Roger Caves, San Diego State University and San Diego State University Foundation)
- July 2001 *Historical Assessment of The Kirkland Apartments Building Located At 2309 Fifth Avenue, San Diego, CA, 92103*
- July 2001 *Historical Assessment of The Building Located At 4230 Maryland Street, San Diego, CA, 92103* (With Kathleen A. Crawford)
- June 2001 *Historical Assessment of the 2525-2529, 2537-2547, 2561 First Avenue Residences, San Diego, CA 92103*
- May 2001 *Update of The November 1988 Historic Site Inventory of Centre City East for Centre City Development Corporation* (with Scott Moomjian)
- April 2001 *East Village Inventory of All Sites Appearing to Be More Than 45 Years of Age Not Previously Documented* (Prepared for Centre City Development Corporation)
- April 2001 *Update of The May 1989 Historic Site Inventory of Bayside for Centre City Development Corporation*
- January 2001 *Historic Survey Report of The Former Teledyne-Ryan Aeronautical Complex 2701 North Harbor Drive San Diego, CA 92101*(with Scott Moomjian)
- January 2001 *Historical Assessment of The Fletcher-Salmons Building 602-624 Broadway, San Diego, CA 92101*
- December 2000 *Cultural Resource Report for The Winona Avenue Area Elementary School Preferred Site, Alternative 1 Site, and Alternative 2 Site* November 2000
Cultural Resource Report for The Edison/Hamilton/Parks Area Elementary School Preferred Site and Alternative Sites
- November 2000 *Cultural Resource Report for The Adams/Franklin Area Elementary School Preferred Site and Alternative Site*
- October 2000 *The National Register of Historic Places Travel Itinerary; Old Town San Diego*
- August 2000 *Cultural Resource Report for The Winona Avenue Area Elementary School Preferred Site and Alternative Sites*
- July 2000 *Cultural Resource Report, 52nd Street Area Elementary School Preferred & Alternative Sites, San Diego, CA*
- July 2000 *Historical Assessment of the 3658 Warner Street Residence, San Diego, CA 92106*
- July 2000 *Historical Assessment of the 367 Catalina Boulevard Residence, San Diego, CA 92106*
- July 2000 *Historical Assessment of the 906 West Lewis Street Residence, San Diego, CA 92103*
- May 2000 *Historical Assessment of the 501-503, 507 and 509 14th Street Residences, San Diego, CA*
- May 2000 *The San Diego Flume Company System Redwood Pipeline, San Diego County, CA*
- March 2000 *Historical Assessment of The Society for Crippled Children's Hydrotherapy Gymnasium Located at 851 South 35th Street, San Diego, CA 92113*

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