

**ADMINISTRATIVE DRAFT**

**INITIAL STUDY**

**HEADQUARTERS COMPLEX, SITE AND SECURITY, AND ENTRANCE  
REALIGNMENT PROGRAM**

**PROJECT NO. P1-128**

Prepared for:



Orange County Sanitation District  
Sanitation District Plant 1  
10844 Ellis Avenue  
Fountain Valley, CA 92708

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November 2017

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## LIST OF ACRONYMS

AAQS	ambient air quality standard
AB	Assembly Bill
AFIP	Administrative Facilities Implementation Plan
AQMP	air quality management plan
BMP	best management practice
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
City	City of Fountain Valley
EIR	Environmental Impact Report
FIRM	Flood Insurance Rate Map
fleet	fleet vehicle maintenance
GHG	greenhouse gas
HCP	Habitat Conservation Plan
I-405	Interstate 405
LOS	level of service
MBTA	Migratory Bird Treaty Act
mi	mile(s)
MRZ	Mineral Resource Zone
NCCP	Natural Community Conservation Plan
NPDES	National Pollutant Discharge Elimination System
OCSA	Orange County Sanitation District
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
Plant No. 1	OCSA's Reclamation Plant No. 1
PRC	Public Resources Code
Project	Headquarters Complex, Site and Security, and Entrance Realignment Program, Project No. P1-128
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SH	Seismic Hazard
SP	Specific Plan
WQMP	Water Quality Management Plan



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## 1.0 INTRODUCTION

### 1.1 BACKGROUND

The Orange County Sanitation District (OCSD) provides wastewater collection and treatment for 2.5 million residents in Orange County, California. The administrative, engineering, and laboratory functions for OCSD are located at OCSD's Reclamation Plant No. 1 (Plant No. 1) in Fountain Valley. In addition, there is staff housed in aging office trailers throughout Plant No. 1. The California Department of Transportation (Caltrans) and the Orange County Transportation Authority (OCTA) may be installing a new southbound on-ramp for Interstate 405 (I-405) at Ellis Avenue, which would require the relocation of Plant No. 1's main entrance. A part of I-405 project, Caltrans and OCTA plan to provide a new signalized entrance to Plant No. 1 at Pacific Street, which would enter directly in front of the existing administration building and bisect the employee parking lot.

In 2013, OCSD commissioned an Administrative Facilities Master Plan to provide management and the OCSD Board of Directors with the necessary information to make policy decisions regarding the administrative infrastructure facilities at Plant No. 1. OCSD later prepared an Administrative Facilities Implementation Plan (AFIP) to describe an organized program to replace the aging on-site buildings. Following preparation of the AFIP, OCSD prepared an Alternate Site Evaluation that addressed the impact of the Caltrans/OCTA Project on Plant No. 1 and developed four alternate site plan options showing building footprints, parking, access, etc., for the administration building and laboratory. Based on the evaluation, OCSD selected the Southwest Plant Alternative as the preferred alternative for evaluation under the California Environmental Quality Act (CEQA).

Around the time the CEQA evaluation was to begin, OCSD also began to evaluate the possibility of locating the administrative and laboratory facilities at an off-site location. Several locations were evaluated but were found to be infeasible, or OCSD was unable to acquire the property in question. In 2017, OCSD acquired 2 acres north of Plant No. 1 on Ellis Avenue between Pacific Street and Bandilier Circle. OCSD later initiated proceedings to acquire an additional 3 acres, contiguous with the initial two parcels, and at such time re-initiated the CEQA process to evaluate the potential effects of the Headquarters Complex, Site and Security, and Entrance Realignment Program, Project No. P1-128 (Project).

### 1.2 PURPOSE

This Initial Study has been prepared pursuant to CEQA, as amended (Public Resources Code [PRC] §21000 et seq.) and in accordance with the State CEQA Guidelines (California Code of Regulations [CCR] §15000 et seq.).

In accordance with State CEQA Guidelines Section 15367, OCSD is identified as the Lead Agency for the proposed Project. The Lead Agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment (PRC, Section 21067). OCSD, as the Lead Agency, has the authority to approve, adopt, or certify the accompanying environmental documentation.



Pursuant to Section 15063(a) of the State CEQA Guidelines, OCSD is required to undertake the preparation of an Initial Study to determine whether the proposed action will have a significant effect on the environment. The purposes of this Initial Study are to (1) identify potential environmental impacts, (2) provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or Negative Declaration, (3) enable the Lead Agency to modify the proposed Project (through mitigation of adverse impacts), (4) facilitate assessment of potential environmental impacts early in the design of the proposed Project, and (5) provide documentation for the potential finding that the proposed Project will not have a significant effect on the environment or can be mitigated to a level of insignificance (CEQA Guidelines, Section 15063[c]). This Initial Study is also an informational document providing an environmental basis for subsequent discretionary actions that could be required from other Responsible Agencies.

### 1.3 STATUTORY REQUIREMENTS AND AUTHORITY

State CEQA Guidelines Section 15063 identifies certain information that must be included in an Initial Study. Pursuant to those requirements, an Initial Study shall include (1) a description of the proposed project, including the location of the project site; (2) an identification of the environmental setting; (3) an identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that some evidence exists to support the entries; (4) a discussion of ways to mitigate significant effects identified, if any; (5) an examination of whether the proposed project is compatible with existing zoning, plans, and other applicable land-use controls; and (6) the name(s) of the person or persons who prepared or participated in the preparation of the Initial Study (State CEQA Guidelines, Section 15063[d]).

### 1.4 PERMITS AND APPROVALS

Public agencies may use this Initial Study as the basis for their decisions to issue approvals and/or permits for the proposed Project. Table 1-A, Project Permits and Approvals, provides a list of entitlements and permits that could be required for the proposed Project.

**Table 1-A: Permits and Approvals Needed**

Agency Name	Permit or Approval
Orange County Sanitation District	Environmental Impact Report Certification Acquisition of Property through Eminent Domain or Negotiated Sale Approval of the Site Plan Issuance of Construction Bid Package
Santa Ana Regional Water Quality Control Board	NPDES Construction General Permit NPDES Dewatering Permit (if groundwater dewatering during construction is required)
City of Fountain Valley	Approval of Traffic Control Plan Issuance of Building Permits

NPDES = National Pollutant Discharge Elimination System





## 1.5 AGENCY CONSULTATION AND COORDINATION

The agencies listed in Table 1.A could require OCSD to obtain approvals for the proposed Project and are considered “Responsible Agencies” under CEQA Guidelines Section 15381. Coordination with these and other agencies may be required to determine the specific nature of any future permits or approvals.

During the preparation of this project, OCSD informally consulted with responsible agencies to obtain their input. OCSD will also formally consult with these responsible and trustee agencies prior to determining whether a negative declaration or EIR is required for this project (PRC Section 21080.3[a]). In addition, this initial study is intended to provide agencies and the general public with information that is necessary to the discretionary approvals process and the approval, or conditional approval, of any aspect of the proposed Project within the jurisdiction of the agency.



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## 2.0 PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

Orange County Sanitation District (OCSD) Reclamation Plant No. 1 (Plant No. 1) is a 114-acre facility that treats approximately 130 million gallons of wastewater per day. OCSD's administrative, engineering, and laboratory are located primarily at Plant No. 1. In addition, there is staff housed in aging office trailers throughout Plant No. 1. OCSD has decided the most cost-effective solution is replacement of the aging buildings and trailers with new buildings that serve administrative, engineering, and laboratory functions.

As such, OCSD proposes to construct a new headquarters complex north of Ellis Avenue. The proposed Headquarters Complex, Site and Security, and Entrance Realignment Program, Project No. P1-128 (Project), also includes the demolition of structures and installation of perimeter security at OCSD Plant No. 1.

### 2.2 PROJECT LOCATION

The Headquarters Complex, Site and Security, and Entrance Realignment Program, Project No. P1-128 (Project) site is located in Fountain Valley in Orange County.

As described in greater detail below, the proposed Project includes areas of demolition and the installation of perimeter security at OCSD Plant No. 1, while the proposed headquarters building, laboratory, and associated parking would be located on an approximately 5-acre site north of Plant No. 1 (Assessor's Parcel Nos. 156-163-06, 156-163-08, 156-163-09, 156-163-10, 156-163-11, and LL-01-01).

For the purpose of the analysis in this Initial Study, OCSD's Plant No. 1 will be identified as such, while the term "Project Site" will refer to the 5-acre site north of Ellis Avenue intended to be the future location of the headquarters complex (refer to Figure 1: Project Location).

OCSD Plant No. 1 is bounded by Ellis Avenue to the north, the Santa Ana River to the east, the Orange County Water District (OCWD) and Ward Street to the west, and Garfield Avenue to the south. The Project Site is bound by industrial uses to the north, Pacific Street to the east, industrial uses and Bandilier Circle to the west, and Ellis Avenue to the south. As shown on Figure 1: Project Location, regional access is provided by I-405.

### 2.3 SURROUNDING LAND USES

The area around Plant No. 1 consists of a mix of industrial and residential uses. A nursery and electrical substation are located to the south, single-family residential homes to the west, and industrial warehouse buildings to the north of OCSD Plant No. 1. Single-family residential homes are located to the east across the Santa Ana River.



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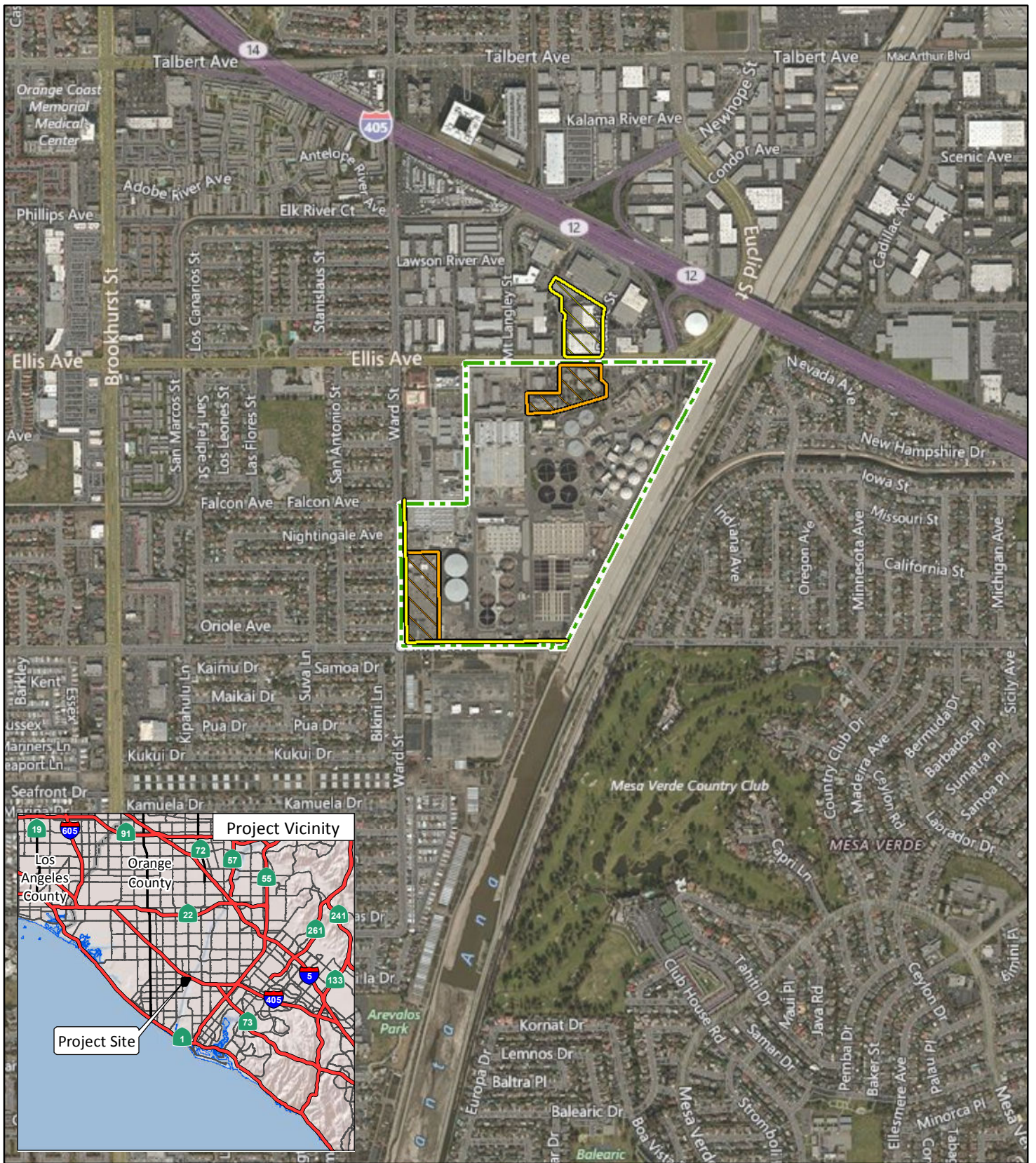



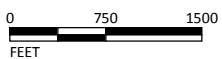


FIGURE 1

**LSA**

**LEGEND**

-  Project Site
-  Demolition Areas on Orange County Sanitation District Plant No. 1
-  Existing Orange County Sanitation District Plant No. 1



SOURCE: Bing Maps (2015)

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Orange County Sanitation District  
Headquarters Complex Project  
Project Location



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The Project site and the surrounding areas are characterized by 1970s concrete tilt-up buildings that are occupied by a variety of light industrial (e.g., warehousing), retail, and office uses. Many of these buildings were constructed pursuant to Fountain Valley's former Industrial Redevelopment Plan Area. I-405 is approximately 414 feet north of the Project site.

## 2.4 EXISTING SITE CONDITIONS AND LAND USE DESIGNATIONS

OCS D's Plant No. 1 is designated in the City of Fountain Valley (City) General Plan and is zoned as a Specific Plan Area. As described above, the administrative, engineering, and laboratory functions of OCS D are located at Plant No. 1, and many of the buildings housing these important functions are now in need of replacement or rehabilitation. In addition, there is staff housed in aging office trailers throughout Plant No. 1. The Project would primarily affect two areas of Plant No. 1: the southeast corner and the northern center area. The southeast corner is developed with several modular buildings (i.e., trailers). The northern center portion is developed with administration, laboratory, fleet services, and human resources buildings, as well as a risk management safety and security trailer.

The Project Site is in the Fountain Valley Crossings Specific Plan area. An EIR for the Specific Plan was circulated for public review in early 2017, but has not been certified as of October 2017. As such, the Specific Plan is still a draft (i.e., not adopted). The Project site is designated Industrial (Commercial Manufacturing) in the City's General Plan and is zoned as M-1 (Manufacturing). The location north of Ellis Avenue is currently developed with five industrial buildings.

## 2.5 PROJECT CHARACTERISTICS

The proposed Project is an plan to replace aging and outdated administrative and laboratory buildings, to address needed security and site improvements in both the north and south areas of the plant, and to accommodate Caltrans/OCTA plans for the new southbound I-405 on-ramp at Ellis Avenue.

Existing structures located on the Project Site would be demolished. As shown on Figure 2: Conceptual Site Plan, the following facilities would be constructed in their place:

- An approximately 109,500-square-foot administration building. The administration building would be three to four stories and would also include a one-story Board Room.
- The two-story laboratory building would be approximately 42,500 square feet.
- A two-level parking structure with 360 spaces.
- Landscaping, signage, and security lighting

The new buildings would provide modern, state-of-the-art space that consolidates OCS D business operations, providing a collaborative, sustainable, flexible work environment and improving the efficiency and adaptability in the laboratory environment.



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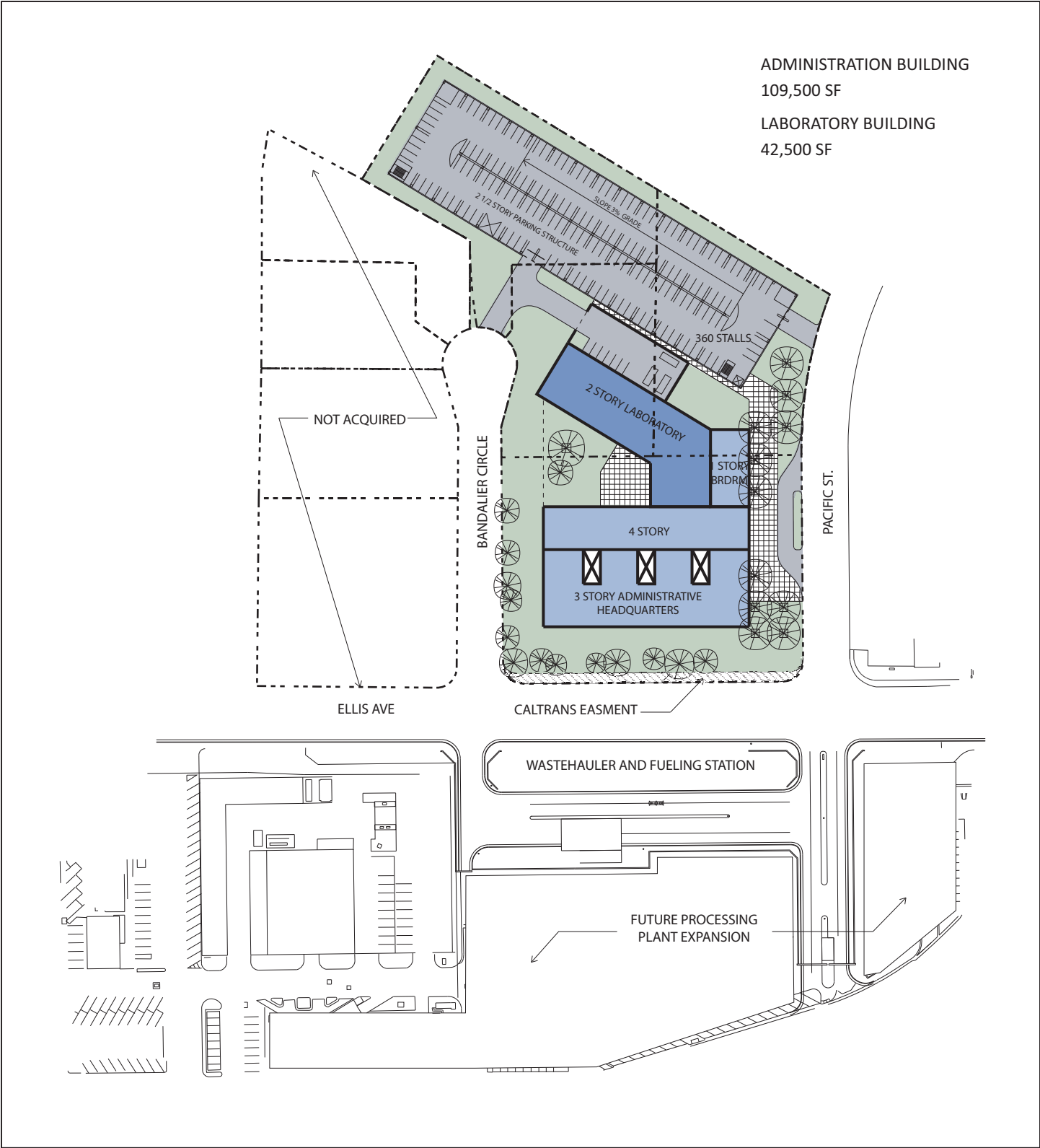
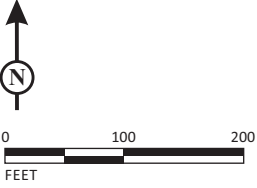


FIGURE 2

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Orange County Sanitation District  
Headquarters Complex Project  
Conceptual Site Plan



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Once administrative functions are relocated to the new facilities, the existing modular buildings (i.e., trailers) in the southwest corner of Plant No. 1, the existing Administration, Laboratory Human Resources buildings and the Risk Management trailer on the north side of Plant No. 1 would be demolished (Figure 3: Demolition Plan). Future uses for these areas have not been identified.

A pedestrian overcrossing may be constructed across Ellis Avenue to connect Plant No. 1 with the new Administration Headquarters Complex on the Project site.

In addition, as shown on Figure 4, Perimeter Security Plan, an 8-foot-high block wall and security lighting would be installed along the perimeter of Plant No. 1 adjacent to Ward Street and Garfield Avenue.



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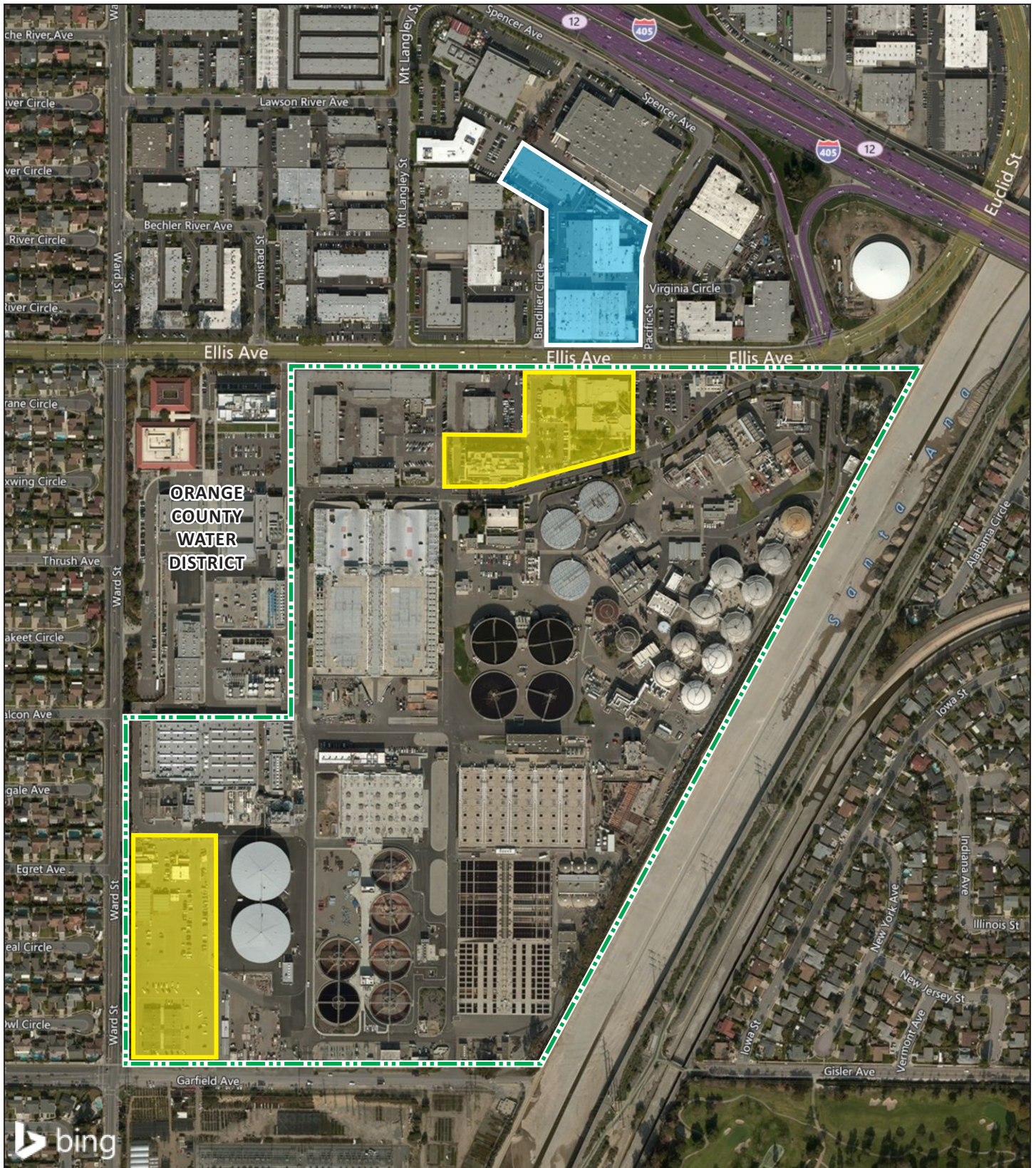





FIGURE 3

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FEET  
SOURCE: Bing Maps (2015)

LEGEND

-  Existing Orange County Sanitation District Plant No. 1
-  Proposed Headquarters Complex (Existing Buildings to be Demolished)
-  Demolition Area

Orange County Sanitation District  
Headquarters Complex Project  
Demolition Plan



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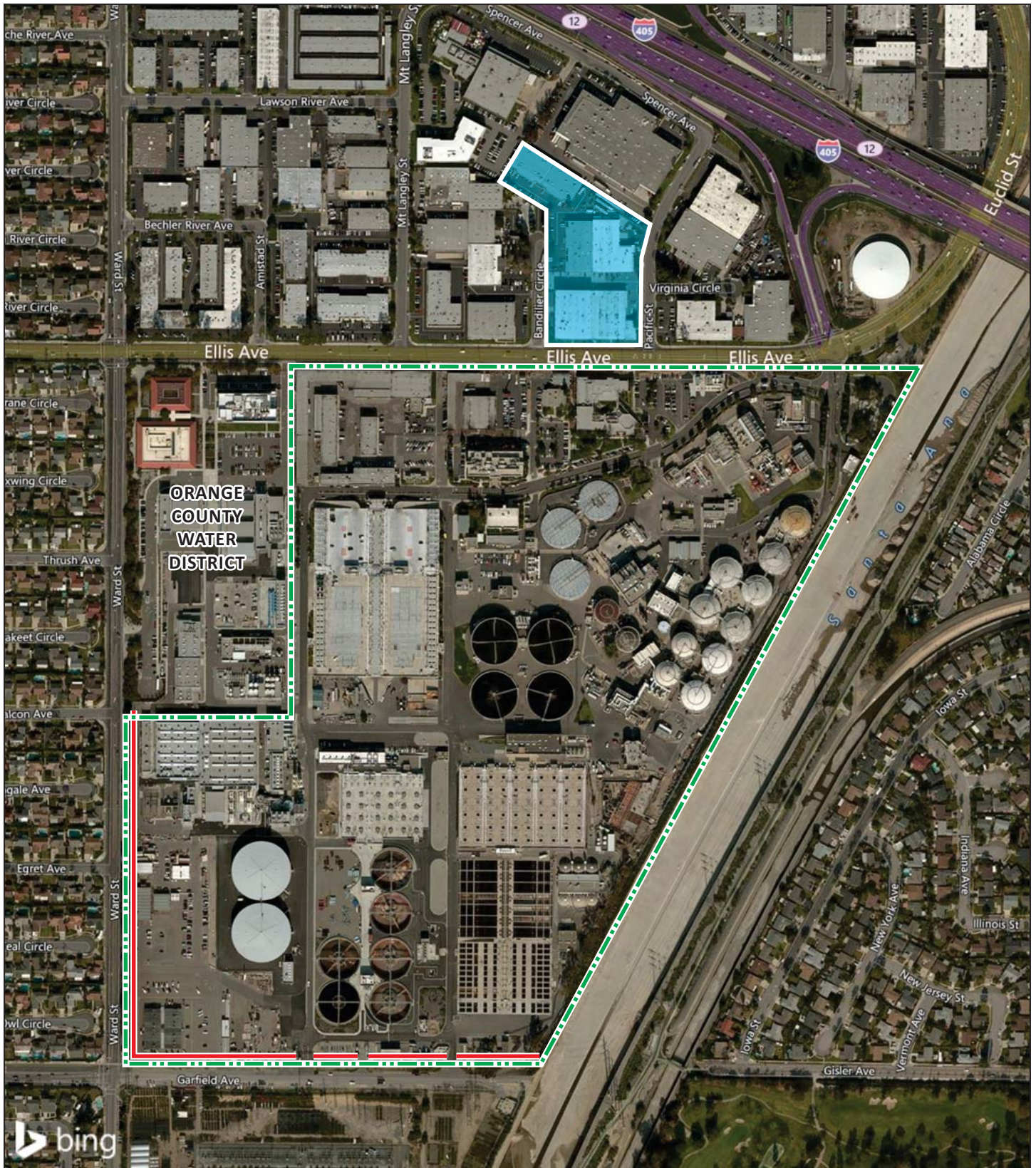


FIGURE 4

LSA



0 500 1000  
FEET

SOURCE: Bing Maps (2015)

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LEGEND

- Existing Orange County Sanitation District Plant No. 1
- Proposed Headquarters Complex (Existing Buildings to be Demolished)
- New 8ft-High Block Wall

Orange County Sanitation District  
Headquarters Complex Project  
Perimeter Security Plan



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## 3.0 ENVIRONMENTAL CHECKLIST

### 3.1 PROJECT DESCRIPTION AND BACKGROUND

#### 3.1.1 Project Title

Headquarters Complex, Site and Security, and Entrance Realignment Program, Project No. P1-128

#### 3.1.2 Lead Agency Name and Address

Orange County Sanitation District  
Sanitation District Plant 1  
10844 Ellis Avenue  
Fountain Valley, CA 92708

#### 3.1.3 Contact Person and Phone Number

Kevin Hadden, (714) 593-7462

#### 3.1.4 Project Location

The Headquarters Complex, Site and Security, and Entrance Realignment Program, Project No. P1-128 (Project) site is located at 10844 Ellis Avenue, 18368–18484 Bandilier Court, and 18429–18475 Pacific Street in Fountain Valley, Orange County, California.

#### 3.1.5 Project Sponsor's Name and Address

Orange County Sanitation District  
10844 Ellis Avenue  
Fountain Valley, CA 92708

#### 3.1.6 General Plan Designation

The Project site is designated "Industrial – Commercial Manufacturing" and "Specific Plan Area."

#### 3.1.7 Zoning

The Project site is zoned "Manufacturing" (M-1) and "Specific Plan" (SP).

#### 3.1.8 Description of Project

The proposed Project includes demolition of the existing industrial warehouse buildings and construction of a new Administration Headquarters Complex on the Project Site. The existing structures on Plant No. 1 that would be demolished as part of the Project include the engineering, contracts, and risk management trailers, as well as Administration, Laboratory, and Human Resources buildings.



The proposed Project would include the construction of a 109,500-square-foot administration building, a 42,500-square-foot laboratory building, and a parking structure on the Project site. The southern two-thirds of the administration building would be three stories and the northern one-third would be four stories, with a one-story Board Room in the northeastern corner. The laboratory would be two stories. The 2.5-story parking structure would include 360 parking spaces. Landscaping and security lighting would be installed along the perimeters of the buildings. A pedestrian overcrossing may be constructed across Ellis Avenue to connect the Plant No. 1 with the new Administration Headquarters Complex on the Project site. An 8-foot-high block wall and security lighting would be installed along the perimeter of Plant No. 1 adjacent to Ward Street and Garfield Avenue.

### **3.1.9 Surrounding Land Uses and Setting**

A mix of industrial and residential uses make up the general character of the area around Plant No. 1 and the Project site.

### **3.1.10 Other Public Agencies Whose Approval is Required**

OCSD may be required to obtain approval or permits from the Santa Ana Regional Water Quality Control Board and the City. Refer to Table 1.A.

### **3.1.11 Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

In compliance with Assembly Bill 52 (AB 52), letters were distributed on September 28, 2017 to the Gabrieleño Band of Mission Indians – Kizh Nation, the Juaneño Band of Mission Indians/Acjachemen Nation, and the San Gabriel Band of Mission Indians notifying each tribe of the opportunity to consult with OCSD regarding the proposed Project. No responses or requests for consultation have been received from the Juaneño Band of Mission Indians/Acjachemen Nation or the San Gabriel Band of Mission Indians. On October 5, 2017, Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation, requested to be consulted on the Project. OCSD responded to the request via email on October 5, 2017, and October 24, 2017, to arrange a meeting with the tribe, to which Mr. Salas has not responded. OCSD will continue the consultation process with the Gabrieleño Band of Mission Indians – Kizh Nation during the CEQA process.



### 3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below potentially would be affected by the proposed Project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages. Please see the Environmental Checklist for additional information.

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

### 3.3 DETERMINATION

On the basis of this initial evaluation:

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

  
\_\_\_\_\_  
Signature

*Kathleen Miller / Eng. Manager*  
\_\_\_\_\_  
Printed Name/Title

Orange County Sanitation District  
\_\_\_\_\_  
Agency

*11/6/2017*  
\_\_\_\_\_  
Date



### 3.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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



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



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## 4.0 ANALYSIS OF ENVIRONMENTAL IMPACTS

### 4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<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 checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Impact Analysis

- a) **No Impact.** Plant No. 1 and the Project site are located in a fully developed area in the southeastern portion of Fountain Valley in Orange County. Plant No. 1 and the Project site are located approximately 0.2 mile (mi) west of the Santa Ana River and 5 mi north of the Pacific Ocean, although neither the river nor ocean can be seen from Plant No. 1 or the Project site due to intervening land uses. In addition, the City General Plan does not designate any scenic vistas or resources in Fountain Valley. As a result, Plant No. 1 and the Project site do not have views of scenic vistas in the area. Therefore, the proposed Project would not result in adverse impacts on scenic vistas, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- b) **No Impact.** Plant No. 1 is currently occupied by buildings, trailers, and wastewater treatment infrastructure associated with OCSD operations. The Project site is currently occupied by industrial warehouse buildings. Plant No. 1 and the Project site do not contain any scenic resources and do not provide scenic views from adjacent land uses or public roads or sidewalks. I-405 is adjacent to the Project site; however, according to the California Scenic Highway Mapping System, I-405 is not considered a State-designated scenic highway. Therefore, the proposed Project would not result in adverse impacts on scenic resources, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- c) **Potentially Significant Impact.** The vicinity of Plant No. 1 and the Project site is characterized by a mix of industrial and residential land uses. Plant No. 1 is currently developed with buildings, trailers, and wastewater treatment infrastructure associated with OCSD operations. The Project site is currently developed with industrial warehouse buildings and surface parking lots. The Project would include construction of a new Administration building, Laboratory building, and a





multilevel parking structure on the Project site, as well as the demolition of the existing buildings and trailers associated with OCSD operations at Plant No. 1. Therefore, the visual character of the site and views of Plant No. 1 and the Project site from off-site areas may substantially change with implementation of the proposed Project. Therefore, the proposed Project would result in potentially significant impacts in the visual character of the site, views of the site, and potential shade and shadow effects on adjacent land uses. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to existing visual character.**

- d) **Potentially Significant Impact.** Light and glare levels surrounding Plant No. 1 and the Project site are typical for industrial park and residential uses. However, the Project would include the installation of new lighting, including signing and security lighting on the Project site, and security lighting along the southwest corner of Plant No. 1. The vicinity of Plant No. 1 and the Project site is generally flat, but light and glare from the proposed perimeter security lighting on Plant No. 1 may be visible from the nearest residential neighborhood, approximately 0.2 mi west of Plant No. 1 along Ward Street. The new sources of light and glare associated with the proposed Project could adversely affect sensitive receptors (e.g., the residents west of the Project site). **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse project light and glare effects.**





## 4.2 AGRICULTURE AND FORESTRY

In determining whether impacts to agricultural resources are significant environmental effects, Lead Agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

- a) **No Impact.** Plant No. 1 and the Project site, like most of Orange County, are in an area that has been designated as Urban and Built Up Land by the California Department of Conservation (2014). Plant No. 1 and the Project site are not currently designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As a result, the proposed Project would not impact designated farmlands, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- b) **No Impact.** The Land Use Element of the City General Plan designates the Project site as Industrial-Commercial Manufacturing and Plant No. 1 as a Specific Plan Area. The Project site is zoned Manufacturing (M-1) and Plant No. 1 is zoned Specific Plan (SP). Plant No. 1 and the Project site are not zoned or currently used for agricultural purposes, and no Williamson Act contracts are in effect for Plant No. 1 or the Project site. As a result, the proposed Project would not conflict with existing zoning or Williamson Act contracts. No mitigation is required. **This**



**topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**

- c) **No Impact.** The Land Use Element of the City General Plan designates the Project site as Industrial-Commercial Manufacturing and Plant No. 1 as a Specific Plan Area. The Project site is zoned Manufacturing (M-1) and Plant No. 1 is zoned Specific Plan (SP). Plant No. 1, the Project site, and the surrounding area are not zoned as forest land, timberland, or timberland production. As a result, no significant impacts would occur, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- d) **No Impact.** Plant No. 1 and the Project site are located in a high-density urban setting. No forest or timberland exists at Plant No. 1, the Project site, or in the surrounding area. Therefore, the Project would not result in the loss of forest land or the conversion of forest land to nonforest use. As a result, no significant impacts would occur, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- e) **No Impact.** The Project site is developed with industrial warehouse buildings and Plant No. 1 is developed with trailers and buildings associated with OCSD operations. Plant No. 1 and the Project site are not currently used for agricultural purposes and are adjacent to non-agricultural, manufacturing uses. The Project would not result in the conversion of farmland to non-agricultural use because there are no agricultural uses on or in the immediate vicinity of Plant No. 1 or the Project site. As a result, the Project would not result in impacts related to the conversion of agricultural land to non-agricultural uses. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



### 4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Impact Analysis

- a) **Potentially Significant Impact.** The Project would include construction of a new administration building, laboratory building, and multilevel parking structure on the Project site, and demolition of existing trailers and buildings on the Plant No. 1 site. An air quality management plan (AQMP) describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State ambient air quality standards (AAQSs). For a project to be consistent with the AQMP adopted by the South Coast Air Quality Management District (SCAQMD), the pollutants emitted from project operation should not exceed the SCAQMD daily threshold or cause a significant impact on air quality, or the project must already have been included in the AQMP projection. Because the AQMP is based on local General Plans, projects that are deemed consistent with a specific General Plan are usually found to be consistent with the AQMP. While the Project is consistent with the City's General Plan designation for the Project site, additional analysis is needed to determine whether the Project would exceed the SCAQMD daily threshold or cause a significant impact on air quality. **This topic will be analyzed in the EIR, and mitigation, if needed, will be developed and included in the EIR to address potentially significant adverse Project effects related to consistency with the AQMP.**
- b) **Potentially Significant Impact.** The proposed Project would involve demolition of the existing engineering trailers, the administration building, the laboratory building, and the human resources building on the Plant No. 1 site and demolition of the industrial warehouse buildings and construction and operation of a new administrative building, laboratory building, and parking structure on the Project site. The proposed Project would result in short-term



construction emissions and long-term operational emissions. An air quality analysis will be conducted to assess (1) potential short-term air quality impacts during clearing, demolition, grading, and construction, including comparison of the Project effects to the federal and State AAQs for criteria pollutants including particulates and toxic air contaminants, and development of mitigation to address any Project-related potentially significant short-term air quality impacts; and (2) potential long-term air quality impacts associated with Project-related vehicular traffic, including comparison of the Project effects to the federal and State AAQs for criteria pollutants including particulates and toxic air contaminants, and development of mitigation to address Project-related potentially significant long-term air quality impacts. The findings of the air quality analysis and recommended mitigation will be described in the EIR. **This topic will be analyzed in the EIR and mitigation will be included in the EIR, if necessary, to address potentially significant adverse impacts for short- and/or long-term Project-related air quality effects.**

- c) **Potentially Significant Impact.** The Project would result in the demolition of existing buildings on the Plant No. 1 site and the Project site and construction and operation of a new administration building, laboratory building, and multilevel parking structure on the Project site. Evaluation of Project-related operations emissions will be conducted to assess whether the Project would result in a cumulatively considerable net increase of any criteria pollutant when considered with other cumulative projects. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to cumulative increases in criteria pollutants.**
- d) **Potentially Significant Impact.** Sensitive receptors are persons defined as more sensitive to the potential unhealthful effects of air emissions. Sensitive receptors can include children and the elderly. Plant No. 1 and the Project site are surrounded by industrial, transportation, and residential uses. Project construction and operation could expose sensitive receptors in the residential area along Ward Street (west of the Project site) to Project-related air emissions. Further evaluation of Project-related air emissions will be conducted as part of the air quality analysis to determine whether the Project would expose sensitive receptors to substantial pollutant concentrations. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse project air quality effects on sensitive receptors.**
- e) **Less Than Significant Impact.** According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Objectionable odors may be generated during the operation of diesel-powered construction equipment and/or asphalt paving during Project construction. Those odors would be temporary, would not result in long-term odor impacts, and would not affect a substantial number of people. The operation of the Administration building and Laboratory building as part of the Project is not anticipated to generate objectionable odors. Therefore, the Project would not result in permanent impacts related to odors on nearby sensitive receptors (e.g., residential uses). No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



## 4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

- a) **Less Than Significant Impact.** Plant No. 1 and the Project site are in an urbanized area and are surrounded by existing urban and suburban land uses. In addition, the improvements associated with the Project would not have the capacity to significantly affect sensitive biological resources given the amount of previous development that has occurred in the vicinity. Project construction and operation would have less than significant impacts either directly or through habitat modification to 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 the United States Fish and Wildlife Service. No impacts to these resources are anticipated as a result of the proposed Project, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



- b) **No Impact.** Plant No. 1 and the Project site do not support any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service. No impacts to these resources are anticipated as a result of the Project, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- c) **No Impact.** No federally protected wetlands would be affected by the proposed Project. Therefore, no impacts to these resources are anticipated as a result of the Project. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- d) **Less Than Significant Impact.** Plant No. 1 and the proposed Project site are not located in a migratory wildlife corridor or native wildlife nursery site. The existing trees on the Plant No. 1 site and the Project site may, however, provide suitable habitat for nesting migratory birds. The removal of trees on the Project site has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq.; see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Game Code. Therefore, implementation of the proposed Project would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests. Project implementation must be accomplished in a manner that avoids impacts to active nests during the breeding season. If Project construction occurs between February 1 and September 15, a qualified biologist would conduct a nesting bird survey prior to ground- and/or vegetation-disturbing activities to confirm the absence of nesting birds. With compliance with the MBTA, impacts to nesting birds would be less than significant and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- e) **Less Than Significant Impact.** Chapter 12.04.040 of the City's Municipal Code requires that no person or development shall engage in the planting, trimming, cutting, or removal of any vegetation along any streets, parkways, or public spaces without prior approval from the City's Public Works Department. The proposed Project would comply with all City policies and regulations protecting biological resources. Therefore, the proposed Project would not conflict with any plan, policy, or ordinance relating to the protection of biological resources, and the impact would be less than significant. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- f) **No Impact.** The County of Orange has approved a Habitat Conservation Plan (HCP) and a Natural Community Conservation Plan (NCCP), but the City has not enrolled in such plans and is not included in the planning area covered by these plans. Consequently, the Project will not conflict with any such plans. While no designated HCP or NCCP exists in the Project area, the Project would comply with all City policies and regulations protecting biological resources. Therefore, the proposed Project would not conflict with any HCP or NCCP or other local, regional, or State HCPs. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



## 4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Potentially Significant Impact.** The Project would include the demolition of existing industrial warehouse buildings on the Project site and buildings and trailers associated with OCSD operations on the Plant No. 1 site. The City’s General Plan does not contain a Historic Preservation Element. However, the Project would involve the demolition of existing buildings and trailers, which could have potential historical significance. As a part of the Project, a historic resources report will be prepared to document and evaluate for historic significance the existing buildings to be demolished. The report will include field methods and results, a historic context, and an evaluation of significance under the California Register of Historical Resources and any applicable local criteria. The findings of the analysis will be incorporated into the EIR. Therefore, the Project would have a potentially significant impact on historic resources; if appropriate, mitigation measures will be recommended. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse impacts to a historical resource as defined by State CEQA Guidelines Section 15064.5.**
- b) **Potentially Significant Impact.** The EIR will incorporate and address the results of an archaeological and historical records review and literature search conducted through the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System, located at California State University, Fullerton. The SCCIC houses the pertinent archaeological site and survey information necessary to determine whether cultural resources exist within the study area boundaries. The archival research will (1) establish the status and extent of previously recorded studies and surveys in the Project area and (2) note what archaeological site types, if any, might be expected to occur in the proposed Project area based on existing data from archaeological sites located within 0.25 mi of the Project area. Based on the records search, a systematic on-site pedestrian survey will be conducted to determine the presence of cultural resources on previously unsurveyed property. Data sources that will be consulted at the SCCIC include archaeological site and isolate records; historic maps; reports from previous studies; and the State Historic Resource Inventory, which contains listings for the





National Register of Historic Places, the California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest. Previously recorded sites within the Project site boundary will be field checked, and existing site records will be updated on revised (1993) site forms consistent with the guidelines established by the State Office of Historic Preservation. **The results of the survey and an evaluation of potential on-site cultural resources will be addressed in the EIR. If necessary, mitigation measures will be included to reduce potential impacts.**

- c) **Potentially Significant Impact.** The EIR will incorporate and address a paleontological records review and literature search of the locality records maintained by the Natural History Museum of Los Angeles County to obtain locality and survey information pertinent to the Project area. The archival research will (1) establish the status and extent of previous surveys in the Project area and (2) note what types of fossils might be expected to occur in the proposed Project area based on existing data from fossils recovered within 0.25 mi of the Project area. **The results of the survey and an evaluation of potential on-site paleontological resources will be addressed in the EIR. If necessary, mitigation measures will be included to reduce potential impacts.**
- d) **Potentially Significant Impact.** No known human remains are interred on the Plant No. 1 site or the Project site. Due to the level of past disturbance on the Plant No. 1 site and the Project site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. In the unlikely event that human remains are encountered during Project grading, the proper authorities would be notified and standard procedures for the respectful handling of human remains during the earthmoving activities would be adhered to in compliance with State Health and Safety Code Section 7050.5 and PRC Section 5097.98. Following compliance with existing State regulations, impacts in this regard would be considered less than significant. No mitigation is required. **Precautionary mitigation may be included in the EIR to address any potential impacts related to unknown remains that might be uncovered at the time of grading. This topic will be addressed in the EIR, and mitigation will be included if necessary.**





## 4.6 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the 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? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

- a) i) No Impact.** Plant No. 1 and the Project site are in southern California, which is a seismically active region. According to the State of California Department of Conservation Earthquake Zones of Required Investigation for the Newport Beach Quadrangle, Plant No. 1 and the Project site are not in an identified Alquist-Priolo Earthquake Fault Zone. The nearest identified Alquist-Priolo Earthquake Fault Zone is approximately 4 mi southwest of Plant No. 1 and the Project site. Therefore, the proposed Project would not expose people or structures to substantial adverse effects involving the rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- a) ii) Potentially Significant Impact.** As discussed in Response 4.6 (a) (i), above, Plant No. 1 and the Project site are not in an identified Alquist-Priolo Earthquake Fault Zone. However, southern California is a known seismically active region. Active and potentially active faults in southern California are capable of producing seismic shaking on the Plant No. 1 site and the Project site.



Thus, it is likely the proposed Project would periodically experience ground acceleration as a result of exposure to moderate to large magnitude earthquakes, and seismic ground shaking on one of the nearby regional faults may cause damage to development. Therefore, the Project has the potential to expose people and structures to substantial adverse effects related to the site and regional geology, including those associated with strong seismic ground shaking. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to strong seismic ground shaking.**

- a) **iii) Potentially Significant Impact.** The Project has the potential to expose people and structures to substantial adverse effects related to the site and regional geology, including those associated with liquefaction. According to the City's Public Safety Element of the General Plan, the area along the Santa Ana River and south of the I-405, which includes Plant No. 1 and the Project area, has a high potential for liquefaction. According to the City's Municipal Code, Section 21.14.050, the Plant No. 1 site and the Project site are in the Seismic Hazard (SH) overlay zoning district. This section states that development in the SH overlay zone may be subject to specific design requirements and preparation of a site-specific soils report due to the high potential for liquefaction to take place. A Preliminary Geotechnical Design Report will be prepared and summarized in the EIR, including recommendations from that report to address Project effects related to or resulting from geologic conditions. Therefore, the Project would have a potentially significant impact related to liquefaction. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to liquefaction.**
- a) **iv) No Impact.** Plant No. 1 and the Project site are relatively flat, and no substantial hillsides or unstable slopes are immediately adjacent to the site boundary. As a result, there is no potential for landslide hazards, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- b) **Potentially Significant Impact.** During Project site preparation, grading, and construction, soil on the site would be exposed and there would be an increased potential for soil erosion compared to existing conditions. In addition, during a storm event, soil erosion could occur at an accelerated rate. The potential for erosion during Project operations would be minimal because Plant No. 1 and the Project site would be paved, covered with buildings, and/or landscaped, and there would not be areas of exposed/disturbed soil on the site. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to erosion during construction.**
- c) **Potentially Significant Impact.** Refer to Responses 4.6 (a) (iii) and (iv), above, for discussion on the potential impacts associated with liquefaction and landslides, respectively. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to liquefaction.**



- d) Potentially Significant Impact.** According to the City's Public Safety Element of the General Plan, much of Orange County is located on expansive soils. Therefore, the proposed Project may be located on a site containing expansive soils, thereby potentially creating a substantial risk to life or property. As stated previously, a Preliminary Geotechnical Design Report will address Project effects related to or as a result of geologic conditions. In addition, the Project will be designed consistent with the relevant Uniform Building Code and California Building Code seismic standards and will comply with the City's Earthquake Hazard Regulations in Chapter 18.68 of the City's Municipal Code. Therefore, the proposed Project would have a potentially significant impact related to expansive soils. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to expansive soils.**
- e) No Impact.** The proposed Project would not include the use of septic tanks or alternative methods for disposal of wastewater into subsurface soils. No on-site sewage disposal systems (e.g., septic tanks) are planned. The proposed Project would connect to existing public wastewater infrastructure. Therefore, the proposed Project would not result in any impacts related to septic tanks or alternative wastewater disposal methods. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



## 4.7 GREENHOUSE GAS EMISSIONS

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

### Impact Analysis

- a) **Potentially Significant Impact.** The proposed Project would generate greenhouse gas (GHG) emissions during construction and operation. GHG emissions associated with Project construction would consist primarily of emissions from equipment exhaust. Long-term regional emissions would also be associated with Project-related vehicular trips and stationary source emissions (e.g., natural gas used for heating). A discussion of GHGs and their potential effects on global climate change will be included in the EIR. It is anticipated that Project-related traffic trips forecast in the traffic study will be used in this GHG analysis. In addition, potential cumulative global climate change impacts associated with the Project will be evaluated. Emissions of carbon dioxide equivalents will be calculated and compared to the area emission levels. If necessary, mitigation measures will be identified to ensure that both short-term and long-term GHG impacts will be reduced to the extent possible. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to GHG emissions.**
- b) **Potentially Significant Impact.** Refer to Response 4.7 (a), above. Regulatory requirements on GHG emissions will be identified, and the Project's compliance with applicable plans and policies will be discussed. Emissions of carbon dioxide, a key GHG identified in Assembly Bill (AB) 32, and other major GHGs (e.g., methane and nitrous oxide) from direct and indirect Project-related sources will be calculated. The Project's emissions will be evaluated for consistency with the goals and emission projections in SCAQMD's Final 2016 AQMP to determine whether Project emissions will cause or delay the timely attainment of State and federal AAQS, as well as meet the emission reduction goals of AB 32, the California Global Warming Solutions Act of 2006, Senate Bill 32, and related climate change legislation. Standard requirements for construction activities recommended by SCAQMD will be identified and incorporated as part of the Project's standard conditions. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.**



## 4.8 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

- a) Potentially Significant Impact.** The EIR will incorporate and address the conclusions of a Phase I Environmental Site Assessment or Hazardous Materials Assessment to evaluate whether hazardous materials or other adverse environmental conditions are present due to past or present uses of the Project site and/or properties in the vicinity of the site. The site assessment will identify whether the Project site is either (1) a former hazardous waste disposal site (and whether the wastes have been removed), (2) a hazardous substance release site identified by the State Department of Health Services, or (3) a site containing one or more pipelines that carry hazardous substances, acutely hazardous substances, or hazardous wastes, except a natural gas line. Potential land use safety and hazard conflicts related to existing land uses near Plant No. 1 and the Project site will also be addressed.



Public or environmental exposure to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes, a transportation accident, environmentally unsound disposal methods, fire, explosion, or other emergency. The severity of potential exposure hazards would vary due to factors such as the type of activity being conducted, the concentration and type of hazardous material or waste, and the proximity to sensitive receptors. Any exposure to hazardous materials associated with the proposed Project is expected to occur during construction activities. OCSA will not engage in the routine transport, use, or disposal of hazardous materials on the Project Site following construction activities. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials.**

- b) **Potentially Significant Impact.** Refer to Response 4.8 (a), above. During construction of the proposed Project, there is potential for the accidental release of hazardous materials, which could adversely affect the public and/or environment. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to the accidental release of hazardous materials into the environment.**
- c) **No Impact.** No existing or proposed schools are located within a 0.25 mi radius of Plant No. 1 and/or the Project site. The nearest schools are Gisler Elementary School and Cox Elementary School, approximately 0.9 mi to the southwest and 1.4 mi to the northwest, respectively, of Plant No. 1 and the Project site. Therefore, the proposed Project would not result in impacts related to hazardous materials and proximity to schools, and no mitigation is required. **This topic will not be covered in the EIR unless related issues not covered here are identified during the scoping process.**
- d) **Potentially Significant Impact.** Refer to Response 4.8 (a), above. The Hazardous Materials Assessment will include a government record search to determine if Plant No. 1 and the Project site could pose a potential environmental concern to the surrounding area, to identify any environmental violations associated with activities conducted at Plant No. 1 and the Project site, and to identify if there are any nearby hazardous waste sites that could pose a hazard to Plant No. 1 and the Project site. Therefore, the proposed Project could result in impacts related to hazards associated with hazardous materials sites. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to hazardous waste sites.**
- e) **No Impact.** Plant No. 1 and the Project site are approximately 6 mi west of John Wayne Airport in Santa Ana. According to the Airport Land Use Commission, Plant No. 1 and the Project site do not fall within the John Wayne Airport Planning Area. Further, the proposed Project would not result in safety hazards for people living or working in the area different than would occur under existing conditions. The proposed Project would not result in an increase in employees at Plant No. 1 and the Project site. Consequently, the risk of safety hazards associated with John Wayne Airport would not be substantively different in this area of Fountain Valley with or without the





Project. Therefore, no impacts would result, and no mitigation is required. **This topic will not be covered in the EIR unless related issues not covered here are identified during the scoping process.**

- f) **No Impact.** No private airports or airstrips are located in the vicinity of Plant No. 1 and the Project site. As a result, the proposed Project will not affect or be affected by aviation activities associated with private airports or airstrips. No mitigation is required. **This topic will not be covered in the EIR unless related issues not covered here are identified during the scoping process.**
- g) **Potentially Significant Impact.** The Fountain Valley Fire Department is responsible for providing emergency response, fire prevention, education, and emergency medical services to citizens and visitors to Fountain Valley. Roads used as response corridors/evacuation routes usually follow the most direct path to or from various parts of a community. For Plant No. 1, the Project site, and the surrounding areas, the main corridors anticipated to be used by emergency services providers are Brookhurst Street, Ellis Avenue, I-405, and other arterials and freeways in this part of Fountain Valley. In addition, the City of Huntington Beach has designated Brookhurst Street as a tsunami evacuation path. The proximity of this evacuation route to Plant No. 1 and the Project site, depending on the traffic impacts of the proposed Project, could result in potentially significant impacts. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to emergency response plans.**
- h) **No Impact.** Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed camp fires, cigarettes, sparks from automobiles, and other ignition sources. Plant No. 1, the Project site, and the surrounding areas are developed with urban and suburban uses and do not include brush- and grass-covered areas typically found in areas susceptible to wildfires. As a result, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death associated with wildland fires. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



## 4.9 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. 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 result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

- a) Potentially Significant Impact.** The proposed Project would result in changes to existing conditions, including the demolition of the existing industrial warehouse buildings on the Project site and the existing engineering trailers, administration building, laboratory building, and human resources building on the Plant No. 1 site. In addition, the proposed Project includes construction of a new administration building, laboratory building, and multilevel parking structure on the Project site.



Construction and operation of the proposed Project has the potential to introduce additional pollutants into the storm drain system. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via storm runoff into receiving waters. During operation, the proposed Project could increase operational pollutants, such as suspended solids/sediments, nutrients, heavy metals, pathogens (bacteria/viruses), pesticides, oil and grease, toxic organic compounds, and trash and debris, that are introduced into storm water runoff. The EIR will evaluate the Project's potential for pollutants of concern in storm water runoff to result in violation of water quality standards and waste discharge requirements.

Project construction would comply with the requirements of the Construction General Permit, including preparation of a Storm Water Pollution Prevention Plan and implementation of Construction Best Management Practices (BMPs). In accordance with the County of Orange Model Water Quality Management Plan (WQMP) template and the Technical Guidance Document for the County of Orange and the City, a preliminary WQMP will be prepared for the Project, which will detail the Low Impact Development features and treatment control BMPs to be included in the Project to reduce pollutants of concern in storm water runoff. Compliance with the applicable permits and the proposed BMPs will be considered in the evaluation of potential water quality impacts in the EIR. **This topic will be analyzed further in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to water quality standards and waste discharge requirements.**

- b) **Potentially Significant Impact.** The potential for groundwater dewatering during construction cannot be ruled out at this time. In addition, the Project could change the impervious surface area of the site, which could in turn affect infiltration of storm water runoff to the groundwater table. The effect the proposed Project could have on groundwater supplies and groundwater recharge will be analyzed in the EIR. The depth to groundwater and the proposed depth of excavation for the Project will be evaluated in the EIR to determine whether groundwater dewatering during construction is required. Potential changes in impervious area and infiltration as a result of Project implementation will also be considered. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to groundwater.**
- c) **Potentially Significant Impact.** Refer to Response 4.9 (a). Although the Project would not alter topography substantially or result in long-term operational conditions that would result in substantial erosion, the Project could result in such impacts during the construction process due to ground-disturbing activities which would expose the top soil. The Project could also increase storm water runoff, which could result in downstream erosion and siltation. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects.**



- d) **Potentially Significant Impact.** The proposed Project could involve a change in impervious surface area. Using information from the Project hydrology report, the EIR will analyze Project impacts related to changes in runoff and the potential for on- and off-site flooding. The hydrology report will include calculations of the existing and proposed runoff peak flows and volume. Taking into consideration the capacity of the existing storm drain systems, the hydrology report will consider any storm drain improvements or BMPs that may be required to mitigate any increase in runoff and to comply with flood control requirements. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects.**
- e) **Potentially Significant Impact.** Refer to Responses 4.9 (a) and (d). The EIR will consider Project compliance with regulatory requirements and proposed BMPs and drainage facilities and will evaluate the need for Project mitigation measures and additional BMPs to ensure adequate treatment and conveyance of storm flows. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to storm water drainage.**
- f) **Potentially Significant Impact.** Refer to Response 4.9 (a). The EIR will evaluate the Project's potential for pollutants of concern in storm water runoff to degrade water quality. Compliance with the applicable permits and the proposed BMPs will be considered in the evaluation of potential water quality impacts in the EIR. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to water quality and hydrology.**
- g) **No Impact.** The proposed Project does not include a housing component. Therefore, the Project would not place housing in a 100-year flood hazard area. No impacts would occur related to placement of housing in a 100-year flood hazard area and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- h) **No Impact.** Plant No. 1 and the Project site are not in a 100-year flood hazard area. According to the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM) Map No. 06059C0254J (December 2, 2009), Plant No. 1 and the Project site are in an area designated as Zone X: Other Flood Areas. Zone X: Other Flood Areas is areas of 0.2 percent annual chance flood (500-year flood), areas of 1 percent annual chance flood (100-year flood) with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1 percent annual chance flood. Specifically, according to the FIRM Map, Plant No. 1 and the Project site are in an area protected by a levee and the 100-year flood is contained in the Santa Ana Channel. Impacts related to inundation from failure of a levee are addressed in Response 3.9 (i), below. Because Plant No. 1 and the Project site are not in a 100-year flood hazard area, the Project would not place structures in a 100-year flood hazard area or impede or redirect flood flows, and no mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



- i) **Less Than Significant Impact.** As discussed in Response 4.9 (h), Plant No. 1 and the Project site are in an area protected from inundation by levees (the Santa Ana River levee system). In addition, according to the Safety Element of the County of Orange General Plan (July 2014), Plant No. 1 and the Project site are in the Prado Dam Inundation Area.

Prado Dam was designed in the 1930s, but increased its functioning capability due to Seven Oaks Dam, which was completed in November 1999, and is approximately 40 mi upstream on the Santa Ana River. During a flood, Seven Oaks Dam stores water destined for Prado Dam for as long as the reservoir pool at Prado Dam is rising. When the flood threat at Prado Dam has passed, Seven Oaks Dam begins to release its stored flood water at a rate that does not exceed the downstream channel capacity. Working in tandem, the Prado and Seven Oaks Dams provide increased flood protection to Orange County.

Prado Dam is maintained and inspected to ensure its integrity and to ensure that risks are minimized. In addition, construction of the Santa Ana River Mainstem Project was initiated in 1989, and is scheduled for completion in 2020. The Santa Ana River Mainstem Project will increase levels of flood protection to more than 3.35 million people in Orange, San Bernardino, and Riverside Counties. Improvements to 23 mi of the Lower Santa Ana River channel, from Prado Dam to the Pacific Ocean, are 95 percent complete, with the remaining bank protection improvements in Yorba Linda currently under construction. Improvements to the Santa Ana River channel include construction of new levees and dikes. In addition, the Santa Ana River Mainstem Project includes improvements to Prado Dam that are currently underway and are estimated to be completed in 2021. The Prado Dam embankment has been raised and the outlet works have been reconstructed to convey additional discharges. Remaining improvements to Prado Dam include acquisition of additional land for the expansion of the Prado Reservoir, construction of protective dikes, and raising of the spillway (Orange County Flood Division 2017).

Although the Project would construct new structures in an inundation zone, the proposed Project would not increase the chance of inundation from failure of Prado Dam. In addition, the Project would not increase the number of employees at Plant No. 1 and the Project site. Therefore, Project impacts related to the exposure of people and structures to significant risk associated with flooding as a result of dam failure would be less than significant. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**

- j) **No Impact.** No large standing bodies of water are located in the immediate vicinity of Plant No. 1 and the Project site that could cause flooding due to seiches. The Pacific Ocean is approximately 5.5 mi from Plant No. 1 and the Project site and, according to the Tsunami Inundation Map for the Newport Beach Quadrangle, Plant No. 1 and the Project site do not fall within the tsunami inundation zone. Plant No. 1 and the Project site are essentially flat, and there are no substantial slopes on or near Plant No. 1 and the Project site. As a result, the risk of mudflow at Plant No. 1 and the Project site would be very low. No mitigation is required. The risk associated with possible seiche, tsunami, and mudflow is, therefore, not considered a potential constraint or potentially significant impact of the Project, and no mitigation is



**necessary. These topics will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**





## 4.10 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

- a) **No Impact.** The Project site is currently developed with existing industrial warehouse buildings and Plant No. 1 is currently developed with buildings, trailers, and wastewater treatment infrastructure associated with OCSD operations. The proposed Project includes demolition of the existing on-site structures and construction of a new administration building, laboratory building, and multilevel parking structure in a fully developed area of southeast Fountain Valley. Demolition would also occur on the Plant No. 1 site. The land uses in the vicinity of Plant No. 1 and the Project site include I-405 to the north, industrial uses to the north and west, residential uses and the OCWD to the west, and the Santa Ana River and associated trail to the east. The Project would include access to/from the Project site via driveways, as well as pedestrian and bicycle access to/from the Project site via sidewalks along the site boundary, which are already developed. As a result, the Project would not result in physical divisions in any established community. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**
- b) **Potentially Significant Impact.** Locally adopted land use plans, policies, or regulations that would be applicable to the proposed Project include the City General Plan and Zoning Code. The Land Use Element of the City General Plan designates the Project site as Industrial-Commercial Manufacturing and Specific Plan Area. The Project site is zoned Manufacturing (M-1) and Specific Plan (SP). In addition, the Project site is in the Draft Fountain Valley Crossings Specific Plan area. The purpose of the Fountain Valley Crossings Specific Plan is to allow for flexible land uses that would foster re-use and re-investment in properties in the plan area. The Draft EIR for the Fountain Valley Crossings Specific Plan was circulated for public review in early 2017, but as of October 2017, the Specific Plan has not been approved. The EIR will include analysis of potential conflicts the proposed Project may have with applicable land use plans, policies, and regulations. The Project's compatibility with existing and planned surrounding land uses, existing land use patterns, and the existing character of the area will also be analyzed in the EIR. If necessary, mitigation measures will be included to reduce potential impacts. The EIR will also contain a complete analysis of the Project's compliance with applicable policies from the City's



General Plan. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to consistency with applicable land use plans, policies, or regulations.**

- c) **No Impact.** As discussed in Response 4.4 (f), Plant No. 1, the Project site, and the surrounding areas are not subject to any HCP or NCCP. Therefore, the proposed Project would not conflict with any HCP or NCCP relating to the protection of biological resources. No mitigation is required. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



## 4.11 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

a) **No Impact.** In 1975, the California Legislature enacted the Surface Mining and Reclamation Act, which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership into four categories of Mineral Resource Zones (MRZs):

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence
- **MRZ-3:** An area containing mineral deposits for which the significance cannot be determined from available data
- **MRZ-4:** An area where available information is inadequate for assignment to any other MRZ zone

Of the four categories, lands classified as MRZ-2 are of the greatest importance. Those areas are underlain by demonstrated mineral resources or are located where geologic data indicate significant measured or indicated resources are present. MRZ-2 areas are designated by the Mining and Geology Board as being “regionally significant.” Such designations require that a Lead Agency’s land use decisions involving designated areas be made in accordance with its mineral resource management policies and that Lead Agencies consider the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency’s jurisdiction.

Plant No. 1 and the Project site have been classified by the California Department of Mines and Geology as MRZ-3, indicating they are located in an area containing mineral deposits for which the significance cannot be determined using available data. Though Plant No. 1 and the Project site are in MRZ-3, no known mineral resources are located on the Plant No. 1 site or the Project site, and the Plant No. 1 site and Project site are not designated or zoned for the extraction of mineral deposits.



The proposed Project would not result in the loss of a known commercially valuable mineral resource. No impacts to known mineral resources would occur as a result of the proposed Project. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**

- b) No Impact.** Refer to Response 4.11 (a), above. The proposed Project would not result in the loss of a known locally important mineral resource. No impacts to known mineral resources would occur as a result of the proposed Project. **This topic will not be analyzed further in the EIR unless new information identifying it as a potential impact is presented during the scoping process.**



## 4.12 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Impact Analysis

**a) Potentially Significant Impact.** Potential noise impacts would result from construction and operation of the proposed Project. Sources of noise during construction would be short-term, and would be caused by construction crew commutes, the transport of construction equipment and materials to the site, and construction equipment and activities. Long-term, operational noise impacts would result from traffic to and from the Project site as well as on-site noise-generating uses (e.g., parking facilities or heating, ventilation, and air conditioning). In addition, there is a potential for a long-term noise reduction from on-site uses on Plant No. 1 as a result of demolition of the existing structures. A noise and vibration technical analysis will be prepared as part of the EIR to evaluate the potential short-term construction and long-term operational noise impacts associated with the proposed Project. The EIR will identify impacts on sensitive land uses in the vicinity of Plant No. 1 and the Project site, including the residential uses west of the site along Ward Street.

The EIR will discuss the applicable City noise and land use compatibility criteria for Plant No. 1, the Project site, and adjacent areas. Standards for regulating noise impacts in the Noise Element of the City General Plan and the City Noise Ordinance will be discussed. The areas where the potential exists for present and/or future noise impacts will be identified using land use information, aerial photographs, and field reconnaissance.



Construction noise and vibration impacts will be quantified based on noise emission levels for general construction phases from the United States Environmental Protection Agency's *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, as well as the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment*. Noise analysis requirements will be based on the City's Noise Ordinance specifications as well as noise limit restrictions provided for construction activities. Noise impacts from construction activities will be analyzed based on the equipment used, length of a specific construction task, equipment power type (gasoline or diesel engine), horsepower, load factor, and percentage of time in use.

Noise impacts on existing sensitive land uses will also be evaluated using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA-RD-77-108, December 1978) and the traffic study prepared for the Project. Though the Project would not result in the generation of noise from new vehicle trips, the Project would cause a redistribution of vehicle trips along local roadways. Noise impacts from on-site noise-generating uses on sensitive residential uses to the west of Plant No. 1 and the Project site will be provided based on the Project's layout and the potential noise-generating source area. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to standards established in the General Plan and Noise Ordinance.**

- b) **Potentially Significant Impact.** Refer to Response 4.12 (a) for discussion of the incorporation of the noise and vibration technical analysis in the EIR. Vibration refers to groundborne noise and perceptible motion. Typical sources of groundborne vibration are construction activities (e.g., pavement breaking and operating heavy-duty earthmoving equipment) and occasional traffic on rough roads. The EIR will evaluate potential vibration impacts associated with Project construction and operation. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to vibration impacts.**
- c) **Potentially Significant Impact.** Refer to Response 4.12 (a) for discussion of potential operational noise impacts. **Long-term noise impacts will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project-related noise impacts.**
- d) **Potentially Significant Impact.** Refer to Response 4.12 (a) for discussion of potential construction-related noise impacts. **Short-term noise impacts will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project-related noise impacts.**
- e) **No Impact.** Plant No. 1 and the Project site are approximately 6 mi west of John Wayne Airport in Santa Ana. According to the Airport Land Use Commission, Plant No. 1 and the Project site do not fall within the John Wayne Airport Planning Area. The Project would not expose employees or patrons of the proposed retail uses to aviation-related noise levels different than would occur under existing conditions. Further, Plant No. 1 and the Project site are not in the 2016 Annual 60–75 Community Noise Equivalent Level Noise Contours area for John Wayne Airport.





Therefore, no aviation-related noise impacts would occur, and no mitigation is required. **This topic will not be covered in the EIR unless related issues not covered here are identified during the scoping process.**

- f) **No Impact.** No private airfields are located in the vicinity of Plant No. 1 and the Project site. Therefore, the proposed Project would not result in noise impacts associated with a private airfield, and no mitigation is required. **This topic will not be covered in the EIR unless related issues not covered here are identified during the scoping process.**



### 4.13 POPULATION AND HOUSING

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

#### Impact Analysis

- a) **Less than Significant Impact.** The proposed Project would not provide new housing opportunities or extend roads or other infrastructure to areas not previously served. The Project would include demolition of the existing industrial warehouse buildings and construction of a new administration building, laboratory building, and multilevel parking structure on the Project site, and demolition of the existing buildings and trailers on the Plant No. 1 site. However, the proposed buildings would not represent a net increase in businesses or jobs because the administration and laboratory uses would provide work space for existing OCSD personnel. Therefore, impacts to population growth would be less than significant because it is unlikely the Project would create new jobs in the area. No mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**
- b) **No Impact.** The proposed Project would not displace any existing housing, and there are no residential uses on the Plant No. 1 site and the Project site. Therefore, there would be no impacts related to the displacement of substantial numbers of housing, and no mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**
- c) **No Impact.** There are no residential uses on the Plant No. 1 site and the Project site. The proposed Project would not displace housing and would not, therefore, displace a substantial number of people, necessitating the construction of replacement housing elsewhere. Therefore, there would be no impacts related to the displacement of substantial numbers of people, and no mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**



## 4.14 PUBLIC SERVICES

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

### Impact Analysis

- a) i) Potentially Significant Impact.** The Fountain Valley Fire Department is responsible for providing emergency response, fire prevention, education, and emergency medical services to citizens and visitors to Fountain Valley. The proposed Project would result in the demolition of existing buildings and trailers on the Plant No. 1 site and the Project site, and construction of a new administration building, laboratory building, and multilevel parking structure on the Project site. The Project may result in limited effects on fire services during the construction period. The operation of the buildings may result in increased demand for fire services on the Project site compared to existing conditions. Conversely, demolition of existing structures may reduce demand for fire services on Plant No. 1. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to increased demand for fire protection.**
- a) ii) Potentially Significant Impact.** The Fountain Valley Police Department is responsible for the prevention, detection, and investigation of crime in Fountain Valley. Similar to Response 4.14 (a), construction and operation of the proposed Project may result in increased demand for police protection services. Although the Project site would be fenced during construction, construction activities may result in limited effects on police services. In addition, the operation of the new buildings may result in increased demand for police services compared to existing conditions. Conversely, demolition of existing structures may reduce demand for police services on Plant No. 1. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to increased demand for police protection.**
- a) iii) Less than Significant Impact.** The proposed Project does not include any residential uses. The schools nearest to Plant No. 1 and the Project site are Gisler Elementary School and Cox Elementary School, approximately 0.9 mi to the southwest and 1.4 mi to the northwest,



respectively. The relocation of administrative employees and functions from the existing administration building, laboratory, and trailers on Plant No. 1 to the Project site is not expected to result in substantial population growth because the Project would not increase the number of staff employed by the OCSD. Therefore, the proposed Project would have a less than significant impact on the school services and facilities, and no mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**

- a) iv) **No Impact.** The proposed Project does not include any residential uses and, as such, would not induce substantial population growth that would generate an increased demand for public facilities (e.g., libraries). In addition, the Project would not increase the number of OCSD employees. While it is possible employees may use libraries or other public facilities in Fountain Valley during lunch breaks or after-work hours, the Project would not increase the number of employees and would not, therefore, increase the existing use of libraries or other public facilities or contribute to substantial physical deterioration of those facilities. Therefore, the proposed Project would not impact other public facilities in Fountain Valley, and no mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**



## 4.15 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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 checked="" type="checkbox"/>

### Impact Analysis

- a) **No Impact.** No existing parks or other recreation uses are located adjacent to Plant No. 1 and the Project site. The nearest parks are Moon Park, approximately 0.2 mi east of Plant No. 1 and the Project site, and Ellis Park, approximately 0.3 mi west of the Project site. The Project does not propose any residential uses and, therefore, would not increase the population near those parks. As discussed in Section 4.13, Population/Housing, the Project is not anticipated to result in the creation of new jobs and employees in the area. Although it is possible employees might use Moon Park, Ellis Park, or other parks in Fountain Valley during lunch breaks or after-work hours, the proposed Project would not increase the number of on-site employees and would not, therefore, increase the use of those parks or contribute to substantial physical deterioration of those facilities. Therefore, the Project would not impact existing neighborhood and regional parks and recreational facilities. No mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**
- b) **No Impact.** Refer to Response 4.15 (a), above. The proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities. No mitigation is required. **This topic will not be further analyzed in the EIR unless related issues not covered here are identified during the scoping process.**



## 4.16 TRANSPORTATION/TRAFFIC

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location which results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) Potentially Significant Impact.** The Project would not result in any increase in the number of employees, deliveries, or other motor vehicle activities compared to existing conditions. Although the Project would not result in the generation of new vehicle trips, the Project would cause a redistribution of vehicle trips along local roadways. The Project would redistribute existing vehicular turn movements from the existing main entry along Ellis Avenue to Ellis Avenue/Pacific Street (including a new traffic signal) and/or Ellis Avenue/Bandilier Circle. In addition, construction of the proposed Project would have potentially significant impacts on traffic. Therefore, a traffic and circulation report will be prepared for the EIR to analyze traffic impacts as a result of the proposed Project. All applicable plans, ordinances, and policies establishing measures of effectiveness for the performance of the circulation system will be analyzed in the EIR. **This topic will be analyzed in the EIR, and mitigation will be developed, if necessary, and included in the EIR to address potentially significant adverse short- and long-term Project effects related to transportation and circulation.**





- b) **Potentially Significant Impact.** Refer to Response 4.16 (a). Levels of service (LOS) on street segments and at street intersections adjacent to and in the vicinity of the site may be impacted. A traffic impact analysis will be prepared to address the potential short- and long-term impacts of the Project related to local traffic and circulation, access to/from the site, and pedestrian and bicycle access and safety on and in the vicinity of Plant No. 1 and the Project site. The traffic impact analysis will be prepared consistent with the City's requirements and will also discuss the OCTA Congestion Management Program. **This topic will be analyzed in the EIR, and mitigation will be developed, if necessary, and included in the EIR to address potentially significant adverse short- and long-term Project effects related to transportation and circulation in relation to the OCTA Congestion Management Program.**
- c) **No Impact.** Plant No. 1 and the Project site are not located in an airport land use plan. The nearest public use airport is John Wayne Airport in Santa Ana, approximately 6 mi west of Plant No. 1 and the Project site. Because Plant No. 1 and the Project site are not in the vicinity of any airfields or airports, the proposed Project would not affect air traffic patterns. No mitigation is required. **This topic will not be covered in the EIR unless related issues not covered here are identified during the scoping process.**
- d) **Potentially Significant Impact.** The traffic impact analysis will include an examination of on-site circulation to ensure logical and safe vehicular circulation via the Project driveways. Adequate turning distances will be confirmed, and LOS and peak-hour traffic signal warrants will be analyzed for the proposed Project driveways. **This topic will be analyzed in the EIR, and mitigation will be developed, if necessary, and included in the EIR to address potentially significant adverse short- and long-term Project effects related to design hazards.**
- e) **Potentially Significant Impact.** The EIR will describe the proposed access to/from the Project site. Access to/from the Project site must be designed to City standards and would be subject to review by the City's fire and police departments for compliance with fire and emergency access standards and requirements. The EIR will describe the existing emergency services and their access needs to/from the Project site and will assess whether the Project plan provides adequate emergency access to/from the Project site. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to emergency access.**
- f) **Potentially Significant Impact.** Pedestrian access to/from the Project site (e.g., from the residential uses west of the Project site) would be available via public sidewalks adjacent to the site. Bicycle access to/from the Project site will be available via the adjacent local streets (i.e., Brookhurst Street, Ward Street, Ellis Avenue, and Euclid Street) and the Santa Ana River Trail, which is immediately east of the Project site. OCTA currently operates the 37 bus route on Ellis Avenue that passes directly in front of the Project site. The EIR will evaluate the potential effects of the Project related to access to/from the site for pedestrians, bicyclists, and transit patrons and will describe Project features such as bus turnouts, marked pedestrian paths across/through the site, and bicycle racks near the retail building that support pedestrian and bicycle travel modes. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to alternative transportation modes.**



## 4.17 TRIBAL CULTURAL RESOURCES

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

### Impact Analysis

- a) i) **Potentially Significant Impact.** Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires that Lead Agencies evaluate a project’s potential to impact “tribal cultural resources.” Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources (PRC, Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside of the definition stated above nonetheless qualifies as a “tribal cultural resource.”

Also per AB 52 (specifically PRC Section 21080.3.1), OCSD must consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project and have previously requested that OCSD provide the tribe with notice of such projects.

In compliance with AB 52, letters were distributed on September 28, 2017 to local Native American tribes who have previously requested to be notified of future projects proposed by OCSD. The letters notified each tribe of the opportunity to consult with OCSD regarding the proposed Project, which included the Gabrieleño Band of Mission Indians – Kizh Nation, the Juaneño Band of Mission Indians/Acjachemen Nation, and the San Gabriel Band of Mission Indians. In compliance with AB 52, tribes have 30 days from the date of receipt of



notification to request consultation on the proposed Project. No responses or requests for consultation were received from the Juaneño Band of Mission Indians/Acjachemen Nation or the San Gabriel Band of Mission Indians during the 30-day period. On October 5, 2017, Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation, sent a letter to OCSD stating that the proposed Project lies within a sensitive area for tribal cultural resources. He requested to be consulted on the Project. OCSD responded to the request via email on October 5, 2017, and October 24, 2017, to arrange a meeting with the Gabrieleño Band of Mission Indians – Kizh Nation, to which Mr. Salas has not responded. OCSD will continue the consultation process with the Gabrieleño Band of Mission Indians – Kizh Nation during the CEQA process. Information provided through tribal consultation will inform the assessment as to whether tribal cultural resources are present, and the significance of any potential impacts to such resources. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects to tribal historic resources.**

- a) ii) **Potentially Significant Impact.** See Response 4.17 (a) (i), above. Tribal consultation is to occur as part of the CEQA process. Information provided through tribal consultation will inform the assessment as to whether tribal cultural resources are present, and the significance of any potential impacts to such resources. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects to tribal resources.**



## 4.18 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Impact Analysis

- a) **Potentially Significant Impact.** OCS D would be the wastewater treatment provider for the proposed Project. The EIR will identify the other utility and service companies/agencies that would provide services to the proposed Project and will describe the locations and capacity of those companies/agencies' infrastructure and utility connections available to serve the Project. The description of each utility and service will also discuss each service provider's expansion plans in the area. The analysis will assess the ability of the existing infrastructure and utility and service providers to meet the short- and long-term Project demand.

The proposed Project would involve the operation of two new buildings, and as such would result in the generation of wastewater. In addition, demolition of existing structures would reduce wastewater generation on Plant No. 1. Potential Project-related impacts to wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to wastewater treatment requirements.**



- b) **Potentially Significant Impact.** Refer to Response 4.18 (a), above. The proposed Project would involve the operation of two new buildings, and as such would require water use and would result in the generation of wastewater. In addition, demolition of existing structures would reduce water demand on Plant No. 1. Potential Project-related impacts to water/ wastewater treatment and collection facilities will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to water/wastewater treatment and collection facilities.**
- c) **Potentially Significant Impact.** Refer to Response 4.18 (a), above. Potential Project-related impacts to storm water drainage facilities will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to storm water drainage facilities.**
- d) **Potentially Significant Impact.** Refer to Response 4.18 (a), above. The proposed Project would require water use related to the operation of two proposed buildings. In addition, demolition of existing structures would reduce water demand on Plant No. 1. Potential Project-related impacts to water entitlements and resources will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to water entitlements and resources.**
- e) **Potentially Significant Impact.** Refer to Response 4.18 (a), above. Potential Project-related impacts related to wastewater treatment capacity will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to wastewater treatment capacity of local providers.**
- f) **Potentially Significant Impact.** Refer to Response 4.18 (a), above. The operation of two new buildings as part of the proposed Project would result in the generation of solid waste. In addition, demolition of existing structures would reduce solid waste generation on Plant No. 1. Potential Project-related impacts to landfill capacity will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to the capacity of regional landfills servicing the site.**
- g) **Potentially Significant Impact.** Refer to Response 4.18 (a), above. The operation of two new buildings as part of the proposed Project would result in the generation of solid waste. In addition, demolition of existing structures would reduce solid waste generation on Plant No. 1. As such, the Project would be required to comply with federal, State, and local statutes and regulations related to solid wastes, and potential Project-related impacts will be assessed in the EIR. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects related to solid waste regulations.**



## 4.19 MANDATORY FINDINGS OF SIGNIFICANCE

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

### Impact Analysis

- a) **Potentially Significant Impact.** CEQA specifies that certain findings, if found to be affirmative, require that a determination of significant impact be made. As discussed in Section 4.4, Biological Resources, the proposed Project does not have the potential to degrade the quality of the environment. In addition, it is not anticipated that the Project would have a significant impact on habitats of fish or wildlife species or cause a fish or wildlife population to drop below self-sustaining levels. Further, the proposed Project would not threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, as discussed in Section 4.5, Cultural Resources, the Project may result in significant impacts to historical, archaeological, and/or paleontological resources. Therefore, the Project would have a potentially significant impact. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects.**
- b) **Potentially Significant Impact.** A significant impact may occur if the proposed Project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. Due to the potentially significant impact of various sections (including Sections 4.1, Aesthetics; 4.3, Air Quality; 4.5, Cultural Resources; 4.6, Geology and Soils; 4.7, Greenhouse Gas Emissions; 4.8, Hazards and Hazardous Materials; 4.9, Hydrology and Water Quality; 4.10, Land Use and Planning; 4.12, Noise; 4.14, Public Services; 4.16, Transportation/Traffic; and 4.18, Utilities and Service Systems), cumulatively considerable impacts could result from implementation of the proposed





Project. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects.**

- c) **Potentially Significant Impact.** A significant impact may occur if environmental effects related to the proposed Project could cause substantial direct or indirect adverse impacts to human beings as described in the checklist responses. Refer to Response 4.19 (b) for a reference to all sections contained in this Initial Study that are anticipated to have a potentially significant impact as a result of the proposed Project. **This topic will be analyzed in the EIR and, if necessary, mitigation will be developed and included in the EIR to address potentially significant adverse Project effects.**



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## 5.0 REFERENCES

The following references were used in the preparation of this Initial Study:

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