

**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION No. PP-24-0149
GRAND AVENUE FLEET SERVICES FACILITY PROJECT**

Prepared for:
**COUNTY OF ORANGE
OC PUBLIC WORKS**
601 North Ross Street
Santa Ana, CA 92701

Prepared by:



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SECTION 1.0 – INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to evaluate the potential environmental impacts associated with implementing the proposed Fleet Service Facility Project. The Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use.

1.1 PROJECT TITLE

Grand Avenue Fleet Facility Project

1.2 LEAD AGENCY NAME | ADDRESS

County of Orange
OC Public Works
601 North Ross Street
Santa Ana, CA 92701

1.3 LEAD AGENCY CONTACT PERSON | TELEPHONE NUMBER | EMAIL

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1.4 PROJECT LOCATION

The Project site would be located at 1400 South Grand Avenue in the City of Santa Ana (City) on two lots - Assessor Parcels Numbers (APNs) 014-161-07 and 014-451-01 (Refer to Figure 1 - Project Location and Vicinity). While the site is currently identified by a single address, new addresses will be established for the proposed facilities upon development. The Fleet Services Facility is proposed to be addressed as 1310 South Grand Avenue, and the Facility Operations Building would be addressed as 1324 South Grand Avenue.

1.5 PROJECT SPONSOR'S NAME | ADDRESS

County of Orange
OC Public Works
601 North Ross Street
Santa Ana, CA 92701

1.6 GENERAL PLAN DESIGNATION

The project site is owned by the County of Orange, but is located in the City of Santa Ana (City) and under the City's General Plan has an Industrial (IND) (City General Plan, 2022a) Land Use Designation. The County's General Plan and Zoning Code do not contain a land use designation or zoning for the site.

1.7 ZONING DISTRICTS

The Project site t is zoned as Light Industrial (M1) according to the City zoning map (City 2024).

SECTION 2.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

2.1 PROJECT OVERVIEW

This IS/MND No. PP-22-0149 analyzes Orange County’s (County) proposed development of a new Fleet Services Facility (Project) that will be a new stand-alone building for the Orange County Public Works Fleet Services Division. The proposed Project will be located at 1400 S. Grand Avenue in the City of Santa Ana (City) (Figure 1). This IS/MND No. PP-24-0149 has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.) and has determined that preparation of a IS/MND would be appropriate under CEQA.

2.2 PROJECT PURPOSE AND OBJECTIVES

The OC Fleet Services offices are currently located at two locations, 445 Civic Center West and 1102 East Fruit Street in the City. The proposed Project will relocate and consolidate the existing facilities to an Orange County-owned land parcel located adjacent to the County Operations Center located at 1300 South Grand Avenue and a County Data Center located at 1400 South Grand Avenue. The primary purpose of the proposed Project is to streamline operations, reduce redundancy, and enhance service delivery across County departments. The Project would serve the fleet vehicles of the Orange County Public Works OC Fleet Services Division.

The Project aligns with the County’s long-term Strategic Facilities Plan goals for sustainable infrastructure and operational excellence. The County’s fleet facility will support improved service delivery, reduce operational costs, and enhance workflow by centralizing maintenance and administrative functions. Additional objectives include replacing aging infrastructure, increasing service capacity, and improving vehicle circulation and safety.

The Fleet Services Facility would create a centralized, modern hub for the County’s fleet operations and would include one building containing vehicle maintenance bays, administrative staff offices, technician workspaces, and storage spaces. The proposed Fleet Services Facility would also include a future Facility Operations building, a future solar panel canopy, surface parking spaces, extended access road, and a disposal lot. The proposed Fleet Services Facility would have the address 1310 South Grand Avenue, and the future Facility Operations Building would have the address 1324 South Grand Avenue.

The proposed Project would continue to provide the following Core Services, which are currently provided at 445 Civic Center West and 1102 East Fruit Street:

- **Maintenance and Repair Services** - Provide repair services for over 3,000 County-owned vehicles and equipment
 - Manage and accounts for all County fleet costs.
 - Implement vehicle emission reduction measures outlined in the South Coast Air Quality Management District (SCAQMD) mandates.
 - Manage and support the operation of County Compressed Natural Gas Fueling.
- **Air Quality Regulations** - Manage the emissions compliance programs to ensure that all rules and regulations are adhered to and reported on as required by the SCAQMD.

- **Vehicle Operations** - Provide centralized parking and storage space for County fleet vehicles when not in use and would serve as the primary location where employees pick up and return fleet vehicles used in County operations.

2.3 PROJECT BACKGROUND

2.3.1 Location

The Project site would be located at 1400 South Grand Avenue in the City on two lots - APNs 014-161-07 and 014-451-01. While the site is currently identified by a single address, new addresses will be established for the proposed facilities upon development. The Fleet Services Facility is proposed to be addressed as 1310 South Grand Avenue, and the Facility Operations Building would be addressed as 1324 South Grand Avenue.

2.3.2 Environmental Setting

The majority of the existing Project site is a flat, undeveloped parcel consisting primarily consisting of non-native and ruderal vegetation resulting from prior land disturbance. Google Earth aerial imagery from 2017 also indicates the presence of vehicle tire marks across the site, suggesting past vehicular disturbance (Google 2025). The proposed access road area off McFadden Avenue currently consists of a driveway, disturbed vegetation, and a parking lot. The proposed access road from Grand Avenue currently consists of a driveway, a parking lot, and disturbed vegetation.

Soils at the Project site consist primarily of loam and silty clay loam. The site is located in the central portion of the Santa Ana Valley, within a landscape characterized by coastal plains that gradually rise toward the foothills of the Santa Ana Mountains and the historic alluvial drainage system. The Project site lies approximately 3.4 miles east of the Santa Ana River and is represented on the United States Geological Survey (USGS) Tustin, California 7.5-minute topographic quadrangle. Site elevations range from 87 to 99 feet above mean sea level (AMSL).

2.3.3 Project Site Access and Circulation

The proposed Project would extend the existing access roads to provide ingress and egress for the Project site via the existing driveways off McFadden Avenue and South Grand Avenue. The Project would add approximately 50,000 square feet (SF) of paved roadway to the access road. The proposed Project would extend the existing driveway off McFadden Avenue, connecting it to the southernmost Project boundary. The existing access road off South Grand Avenue would extend west on Hobart Street to the Project boundary, intersecting with the access road that connects to McFadden Avenue. (See Figure 2 for the Project Access Road.) Access to the Project site would be restricted to County staff.

2.3.4 Surrounding Land Uses and Sensitive Receptors

The land area to the immediate north, south, and east of the Project site are zoned M1. The land area to the immediate west of the Project site is zoned as Suburban Apartment (R4), Single-Family Residence (R1), Planned Shopping Center (C4), and Open Space Land (O) (see Figure 4).

Surrounding land uses that abut the Project Site are summarized in Table 1.

Table 1. Surrounding Land Uses

Direction	General Plan Land Use Designation	Actual Land Uses
North	Industrial, General Commercial;	Restaurants and shops
East	Industrial, Institutional	Orange County Data Center, other County administrative buildings, industrial buildings
South	Industrial, General Commercial	Shops and industrial buildings
West	Low Density Residential, Commercial	Kennedy Elementary School, residences, plaza center

The nearest sensitive receptor to the Project site is the John F. Kennedy Elementary School that is adjacent to the north side of the Project site. Specifically, the eastern school property line is immediately adjacent to the proposed access road off McFadden Avenue. The southern school property line is immediately adjacent to the Project site boundary and approximately 100 feet north of the proposed Fleet Service Standalone Building (see Figure 1). The southern portion of the school contains a field that is used by students periodically throughout the day.

The Project site is 0.15 miles from Century High School and 0.15 miles from Madison Elementary School.

There are also multi-family homes located 55 feet west of the western Project site boundary.

2.4 PROJECT DESCRIPTION

The proposed Project site will be developed with a new facility that will include one single 45,706 SF building containing vehicle maintenance bays, administrative staff offices, technician workspaces, and tool storage spaces (see Figure 3). Additionally, the Project will include a future 20,000 SF Facility Operations Building, a 10,000 SF solar panel canopy, surface parking spaces, extended access road, and a disposal lot (see Figure 2). The Project would serve the fleet vehicles of the Orange County Public Works OC Fleet Services Division. Table 2. Project Footprint Summary describes all proposed Project features.

Table 2. Project Footprint Summary

Structure	No. of Offices/Areas	SF	Net SF	Notes
Yard requirements				
Bay Requirements	36	496	17,850	Individual bays would be 18 feet wide. 18 of these maintenance bays shall have vehicle lifts.

Structure	No. of Offices/Areas	SF	Net SF	Notes
Bus Bay	2	2,640	5,280	Individual bays would be 24 feet wide. Shall be located at the end of the building to allow for easy access and circulation in and out of the subject bays.
Body Shop	1	4,500	4,500	
Prep Shop	1	1,500	1,500	
Code 3 (Police Vehicles)	1	2,500	2,500	
Metal Fabrication Shop	1	1,500	1,500	
Parts room	1	1,000	1,000	
Alignment Bay	1	480	480	Shall be located in immediate proximity to the metal fabrication and body shops, and parts room for coordination purposes.
Storage and Tools	1	3,000	3,000	
Used Oil Storage	1	200	200	
Common Spaces				One L-shaped stand-alone single-story building.
Restrooms	1	200	200	
Restrooms w/ Locker & Shower – Men/Women	2	500	1,000	
Lunch Room/Breakroom	1	500	500	
Lobby	1	100	100	
Janitor	1	150	150	

Structure	No. of Offices/Areas	SF	Net SF	Notes
Electrical/IDF/Utilities	1	50	50	
Parts room attendant	1	60	60	
Supervisors	1	195	195	
Service writer	1	65	65	
Pedestrian Corridors	1	5,576	5,576	
Total	46		45,706	

Site				
Building Footprint (Yard Requirements and Common Spaces)			45,000	Includes Yard Requirements and Common Spaces Building.
Surface Parking			~ 70,000	Parking spaces for staff, visitor & press vehicles, Delivery Truck Staging, Emergency Vehicle Staging, and Supply Receiving/Loading. Provide centralized parking and storage space for County fleet vehicles when not in use and would serve as the primary location where employees pick up and return fleet vehicles used in County operations.
Access Roads			50,000	See Section 2.4.2 for details.
Disposal Lot (Open space) – 20 Vehicles			5,000	Designated storage space for decommissioned police vehicles pending their sale at auction.
Canopy Space			10,000	Solar Panel Canopy
Facility Operations Building			20,000	
Total Site			200,000	

Structure	No. of Offices/Areas	SF	Net SF	Notes
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Note: Utilities will cover 200,000 SF of the entire site

Additional proposed features, which are included within the SF above, include:

- Security Fencing & Control Gates & Bollards.
 - Site Lighting
 - Signage & wayfinding
 - Landscaping – drought tolerant
 - Hardscaping
 - Electric Vehicle (EV) charging stations
-

2.5 CONSTRUCTION

The proposed Project would include sustainable design and construction practices such as the use of recycled materials, highly insulated building envelopes, high efficiency heating and cooling systems, high efficiency lighting and controls, abundant use of natural light and daylight harvesting, water conserving plumbing fixtures, drought tolerant native landscaping, construction waste reduction and recycling, minimization of solar heat gain, indoor air quality, and acoustical design.

The anticipated construction activity/phasing would include the following:

- Mobilization
- Site clearing and demolition
- Ground improvement
- Rough grading and preparing building pad
- Excavation for foundations and utilities
- Placement of underground utilities
- Placement of concrete foundations and slab
- Exterior concrete work
- Windows/doors/interior partitions
- Rough electric/ plumbing/heating, ventilation, and air conditioning (HVAC)/fire sprinklers
- Landscaping
- Finishing electric/plumbing/HVAC/fire sprinklers
- Painting
- Final cleaning

2.5.1 Equipment

Equipment to be used during construction may include the following items:

- Excavators
- Skip Loader
- Bulldozer
- Tractor with Scraper
- Backhoe(s)
- Cement Trucks
- Dump Trucks
- Utility Pick-Up Trucks
- Concrete Finishing Equipment and Tools
- Graders and rollers
- Earth Compactor
- Cranes
- Forklifts
- Drill Rig

It is estimated that an average of 25 workers would be present at the construction site daily (Monday through Friday). In addition, approximately 12 truck trips per day are estimated to be required for site clearing and demolition, excavation, grading and hauling activities and for the delivery of concrete during construction. Delivery of the materials for other construction activities is estimated to require 1 to 3 truck trips per day. To be conservative, it is assumed that all the 12 truck trips, in addition to the 25 construction workers, would enter the site during a.m. peak hour and leave during p.m. peak hour, resulting in a total of 74 vehicle trips per day for the 18-month construction period.

2.5.2 Grading

The total size of the Project site disturbance would be approximately 200,000 SF (4.59 acres). It is anticipated that 5 feet of existing earth material in the currently undeveloped Project site, excluding the proposed access roads, would be excavated and backfilled with engineered fill. Approximately 500 cubic

yards (CY) of soil would be excavated for foundations of the New Fleet Facility. Prior to construction, the Project applicant shall obtain a grading permit from the County.

2.5.3 Utilities

The proposed Project would install new underground utility infrastructure to serve the Project's operations. Utility improvements would include the installation of water, sewer, and storm drain lines, as well as dry utilities such as electricity, natural gas, and telecommunications. All utility lines would be installed below grade within the alignments of proposed access road extensions to minimize surface disturbance and ensure long-term access for maintenance. A solar canopy would also be developed on-site to reduce the Project's demand for the electric grid.

Connections would be made to existing off-site utility mains located adjacent to or near the Project site. Utility installation would occur in coordination with the appropriate service providers and would comply with applicable local, state, and federal regulations. No significant utility demands are anticipated as part of the Project, and all necessary infrastructure upgrades would be constructed as part of the Project to ensure adequate capacity and service.

2.5.4 Landscaping and Hardscaping

All landscaping would comply with Section 7-9-71.2. and Section 7-9-68 of the Orange County Codified Ordinances, which establish standards for water-efficient landscaping. The proposed Project would incorporate native, drought-tolerant landscaping to provide ample green space in parking areas to the maximum extent feasible.

In addition, the proposed Project would include the installation of pleasant, shaded outdoor spaces for visitors and employees. These areas would feature built-in benches or other permanent seating elements integrated into the hardscape design. Hardscaping elements may include paved walkways, plaza areas, and other site furnishings designed to enhance accessibility and create inviting, functional outdoor environments.

2.5.5 Signage

The facility shall have a strong visual presence to convey its intended use. The facility should be easily identifiable as a fleet services building through a combination of building-massing, architectural treatment, building signage and monument signs.

Signage shall be highly visible and clearly direct staff and visitors to their destinations. The design of way finding elements shall incorporate OC Fleet Services branded signage and graphics. The Project would include Americans with Disabilities Act (ADA) compliant plaque-type signage, as required, including restrooms, accessible exterior entry and path of travel, assistive listening system provisions and any other code-required signage. There would also be a highly visible exterior monument or marquee building identification sign (or signs, as dictated by the design) including the building address.

2.5.6 Walls and Fencing

Security fences, controlled access gates, security cameras would be incorporated into the site design. The Design specifications of building walls are provided below:

- Corridors: High impact abuse resistant gypsum board up to 4'-0" high, or equivalent.
- Lobby and Public Areas: High impact abuse resistant gypsum board up to 4'-0" high, or equivalent.
- Restrooms: Ceramic wall tile over full mortar setting bed thin set up to 4'-0" high min.; Gypsum board shall moisture and mold resistant.
- Offices: Gypsum wall board with 4" rubber base
- Corner guards: In all corridors, and in other high abuse areas, subject to the use of rolling cages or carts, wall corners shall be fitted with 3" x 3" x 72" brushed stainless steel corner guards with tapered edges.
- Crash rails: Provide continuous crash rails on all corridor walls, and in other high abuse areas subject to the use of rolling cages or carts. Polyvinyl chloride (PVC) free polyethylene terephthalate glycol (PETG) or equivalent.
- Gypsum board finish: Where gypsum drywall with taped joints is used as a finish material, it shall be covered with a light texture surface (orange peel) except in equipment and storage rooms.

2.5.7 Lighting

Lighting of the proposed structure and associated parking would consist of exterior building-mounted fixtures and pole-mounted lights within the parking area. All lighting would be designed to provide adequate illumination for safety and security while minimizing spillovers onto adjacent properties. Fixtures would be shielded and directed downward, consistent with applicable local lighting. High efficiency lighting and controls and abundant use of natural light and daylight harvesting would be incorporated into the site design.

2.5.8 Drainage

The outdoor yard shall be equipped with hose bibs and floor drains to facilitate cleaning and drainage. The yard surface shall be sloped toward the drains at the maximum grade permitted by applicable codes to ensure that water flows freely to the drains, preventing ponding. This design will allow the area to dry quickly after washing or rainfall without requiring manual sweeping or brooming of water into the drains.

2.5.9 Construction Schedule

Construction of the proposed Project is expected to occur from 2027 to 2029, over an 18-month period. Construction activities will take place from 7:00 a.m. to 8:00 p.m. Monday through Saturday and no construction work will occur on Sundays or Federal holidays, according to the County's Noise Control ordinance.

2.5.10 Project Design Features

The proposed Project would include the following Project Design Feature (PDF):

- PDF-1 Prior to the start of site preparation activities, the Project Applicant shall install a minimum 12-foot-high and approximately 1,200-foot-long concrete masonry unit (CMU) wall at the location of the New Wall as shown above in Figure 2 – Site Plan, that would cover the entire length of the south side of JFK Elementary School and east side of the adjacent homes.

2.6 OPERATION AND MAINTENANCE

Operations of the proposed Project would include similar services provided at the existing OC Fleet Services offices located at 445 Civic Center West and 1102 East Fruit Street in Santa Ana. Operations would primarily consist of providing maintenance and repair services to over 3,000 County-owned vehicles and equipment. These services ensure the safety and longevity of County-owned vehicles while maintaining compliance with vehicle rules and regulations. In addition, the facility would provide parking and storage space for County fleet vehicles when not in use and would serve as the primary location where employees pick up and return fleet vehicles used in County operations. Approximately 50 employees would operate the proposed facility Monday through Friday. The Project will not be operational during the City's nighttime noise ordinance hours (between 10:00 p.m. and 7:00 a.m.).

Maintenance and repair services provided during operation of the proposed Project include, but are not limited to:

- Routine Maintenance Services
 - Oil and Filter Changes
 - Fluid Checks and Top-Offs
 - Tire services
 - Brake System Inspection and Maintenance
 - Wiper Blade Replacement
 - Lighting Inspection and Bulb Replacement
 - Air Filter and Cabin Filter Replacement
- Mechanical repairs
 - Engine Diagnostics and Repairs
 - Transmission Service and Repairs
 - Suspension and Steering Repairs
 - Cooling System Repairs
 - Exhaust System Repairs
 - Fuel System Repairs
 - Electrical System Repairs
 - Drive Train and Axle Repairs
- Preventative Maintenance Programs
 - Scheduled Preventative Maintenance Inspections
 - Mileage-Based Service Intervals
 - Department of Transportation/California Highway Patrol Inspections and Compliance Checks
 - Vehicle Emissions Testing and Compliance
- Other Services

- Vehicle Safety Inspections
- Fleet Management Software Recordkeeping
- Vehicle Washing and Detailing
- Upfitting and Equipment Installation
- Parts Inventory and Procurement Services
- Warranty Repairs

2.6.1 Hazards

Hazards associated with Project operations would involve the use, storage and disposal of:

- Motor oil and used oil
- Antifreeze/coolant
- Brake and transmission fluids
- Solvents and degreasers
- Battery acid
- Fuel and fuel additives
- Oily rags and oil absorbents
- Aerosol cans and cleaning chemicals
- Lead-acid and lithium batteries

Handling and storing of hazardous materials during operations of the proposed Project must comply with all applicable federal, state, and County environmental and safety regulations. Federal regulations pertaining to storing and handling hazardous materials include the Resource Conservation and Recovery Act and Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 Code of Federal Regulations [CFR] 1910.1200). State regulations include California Health and Safety Code – Hazardous Materials Business Plan (HMBP) §25500–25520, Title 22 California Code of Regulations (CCR) – Hazardous Waste, and California Fire Code (CFC) Chapter 50 (Hazardous Material). County regulations include County Health Division Certified Unified Program Agency enforcement procedures and Orange County Fire Prevention Code. These regulations are designed to prevent pollution, ensure workers’ safety, and protect public health.

2.7 RELATED PROJECTS

Table 3 below summarizes ongoing related projects within the surrounding vicinity of the Project site.

Table 3. Related Projects

Name	Location	Project Description	Status	Distance from Project Site
Park 55 Industrial Redevelopment Project	1221 & 1231 E. Dyer Road	Applicants propose to demolish two industrial buildings to accommodate three new industrial buildings with new parking, landscaping, and on-site improvements. Building one will be 69,300 SF, building two will be 47,300 SF, and building three will be 59,400	Development Project Review	1.5 mile southwest

Name	Location	Project Description	Status	Distance from Project Site
		SF. This Project requires discretionary review and approval by the Planning Commission and City Council for a Zoning Ordinance Amendment (ZOA) to amend Specific Development 63 (SD-63), and General Plan Amendment (GPA) to redesignate the area from General Commercial (GC) to Industrial/Flex - Low (Flex 1.5). This Project will be subject to sunshine ordinance meeting requirements.		
Warner Redhill Mixed-Use Development (Formerly The Bowery)	2300 S Red Hill Avenue	Arrimus Capital, "Applicant", has applied to redevelop an existing 14.58-acre industrial site currently developed with three large-scale industrial, warehousing, office buildings total 212,121 SF, associated parking areas, and landscaping. The proposed Project will demolish the three industrial buildings and remove all of the existing improvements, including the landscaping, pavement and parking lot and would redevelop of the entire site with 1,100 multi-family residential units and up to 80,000 SF of commercial retail and restaurant space. The development would consist of three mixed-use buildings that would be 6-stories in height and one residential building that would be 5-stories in height. Each of these buildings would have an adjacent parking structure. Two parking structures would provide seven levels of above ground parking and two parking structures would provide six levels of above ground parking. In addition, the Project would develop two one-story retail/restaurant commercial buildings and a surface parking lot along Redhill Avenue. The main vehicular access to the project	Under Construction	1.57 mile southeast

Name	Location	Project Description	Status	Distance from Project Site
		site and parking facilities would be from two driveways on Warner Avenue and one driveway on Redhill Avenue. The Project would provide open space and recreation amenities for residents that would include 5.75 acres of exterior open space recreation area, open space plazas, courtyards, and roof decks, as well as interior amenities and private residential areas.		
Legado at the Met	200 E First American Way	Legado at the Met proposes to construct a 278-unit, 6-story (with lofts) multi-family residential development on a currently vacant property on the northeast corner of MacArthur Boulevard and MacArthur Place. The development will consist of studio, one, two and three-bedroom units ranging in size from approximately 612-1,783 SF. The Project will contain a four-level (one-level above ground and three levels of subterranean), 617 parking-space garage.	Entitlements Approved Grading & Underground plumbing in progress	2 miles southeast
Santa Ana Lyon Towns (Formerly	717 S. Lyon Street	Applicant is proposing a residential development with 51 townhouse units, 15,028 SF of open space and 105 parking spaces. The development will consist of 12 residential buildings with	Under Construction	0.70 mile northeast

Name	Location	Project Description	Status	Distance from Project Site
Warmington Residential)		three-story townhouse units, with eight units proposed as affordable to low-income households. Application is being submitted as a Senate Bill (SB) 330 Project and seeks incentives/concessions. The Project requires a vesting tentative tract map for condominium purposes and a State Density Bonus Agreement for 22.16 du/ac.		
MLC Holdings/Meritage Homes — 2020 East First Street	2020 East First Street	The applicant is proposing to redevelop the 3.72-acre site with 80 three-story townhome units ranging from approximately 1,200 SF to 1,800 SF in size and six live-work units that would be 2,500 SF in size. The units would provide two to four bedrooms and two car garages with either side-by-side or tandem parking configuration. The Project site would have 194 parking spaces including guest parking. As proposed, the Project would require approval of a Tentative Tract Map.	Entitled	1.25 mile northeast
Cabrillo Crossing Townhomes	1814 and 1818 East First Street	Brandywine Homes is proposing to develop two vacant parcels with 35 single-family attached townhomes, six of which are proposed as Live/Work and four as affordable. The proposed townhouse buildings will range in height from 3-4 stories designed with tuck-under parking. The units will range from 2-3 bedrooms and from 1,385 to 2,476 SF in size. The proposed development will require review and approval of a tentative tract map for condominium purposes.	Under Construction 12 units completed 8 units at 80% completed 15 units at 40% completed	1.13 mile northeast

Name	Location	Project Description	Status	Distance from Project Site
The Madison	200 N Cabrillo Park Drive	The Madison is a 6-story mixed use development consisting of five stories of residential and one story of commercial on a vacant 2.79-acre site within the Metro East Overlay (MEMU) planning area. The proposal is to construct 260 residential units including four live/work units, 445 parking spaces, and approximately 6,600 SF of commercial space.	Tolling Agreement approved through June 7, 2021 City Council approved project on June 5, 2018 Applicant filed appeal of PC denial Planning Commission denied project on December 11, 2017 Entitlement Approved (updated: October 11th, 2023)	1.17 mile northeast
Central Pointe Mixed-Use Development	1801 East Fourth Street	The applicant Waterford Property Company proposes to construct a mixed-use Project consisting of 644 multi-family residential units and 15,130 SF of commercial space on an approximately 8-acre site. The project is comprised of two 5-story buildings wrapped around a 7-level parking structure. The Project is located within the Metro East Mixed-Use Overlay District and requires Planning Commission Site Plan Review.	Building Plan Check	1.25 mile northeast

Name	Location	Project Description	Status	Distance from Project Site
Think Together Residential Development	2101 E 4th Street	The Applicant is proposing to construct a 7-story, multi-family building with 270 residential units, approximately 3,700 SF of amenity spaces, 17,709 SF of private open space, 13,504 SF of public open space, and 6,760 SF of non-residential space that can be used for live-work units.	Development Project Review	1.50 mile northeast

Source: City of Santa Ana. 2025. Major Development Activity Report. Available at:
<https://storymaps.arcgis.com/stories/e0a28bb311b040af86f6194abc548bbd>

Figure 1 - Project Location and Vicinity

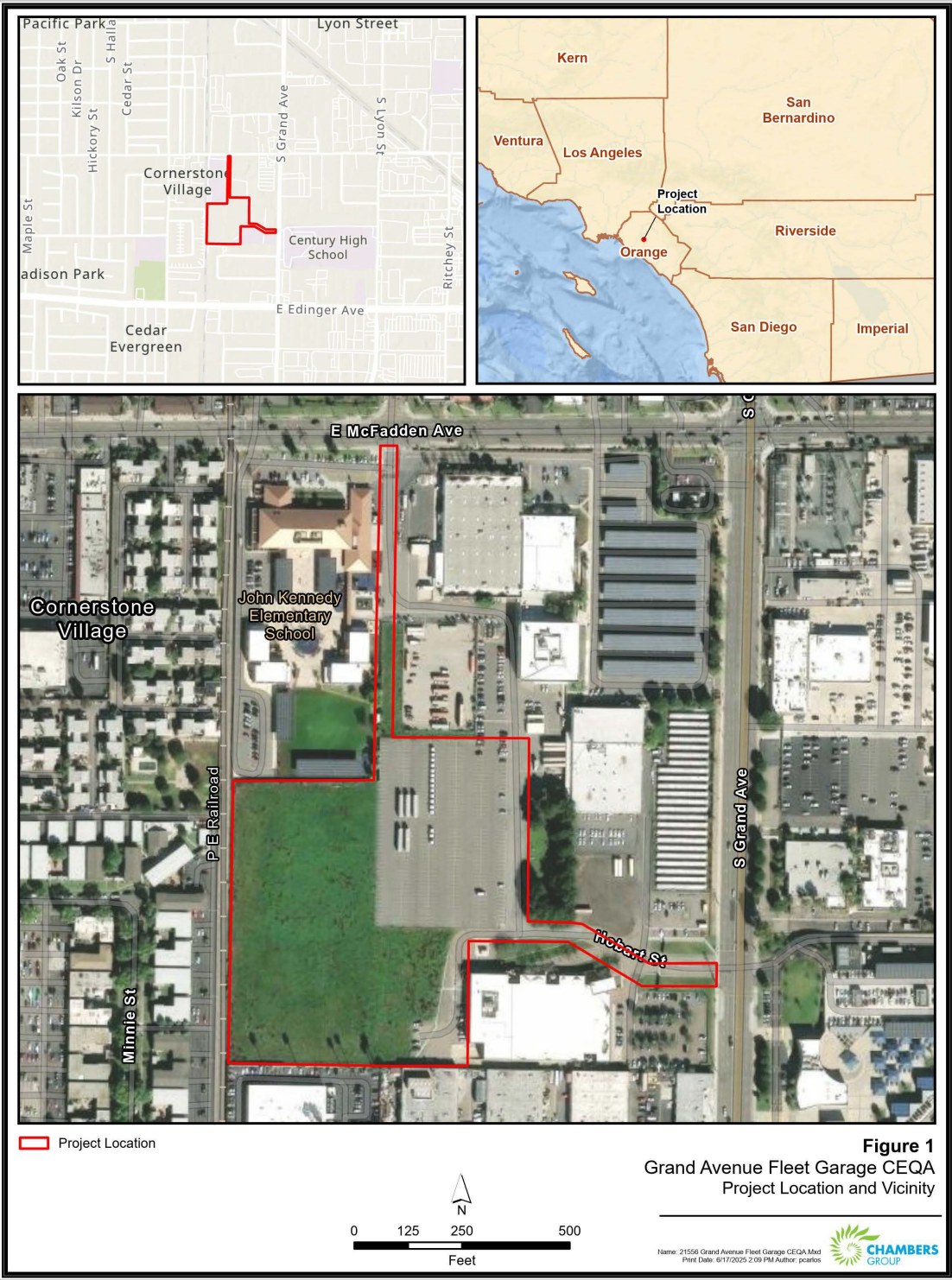


Figure 2 – Conceptual Site Plan



Figure 3 – Detailed Site Plan

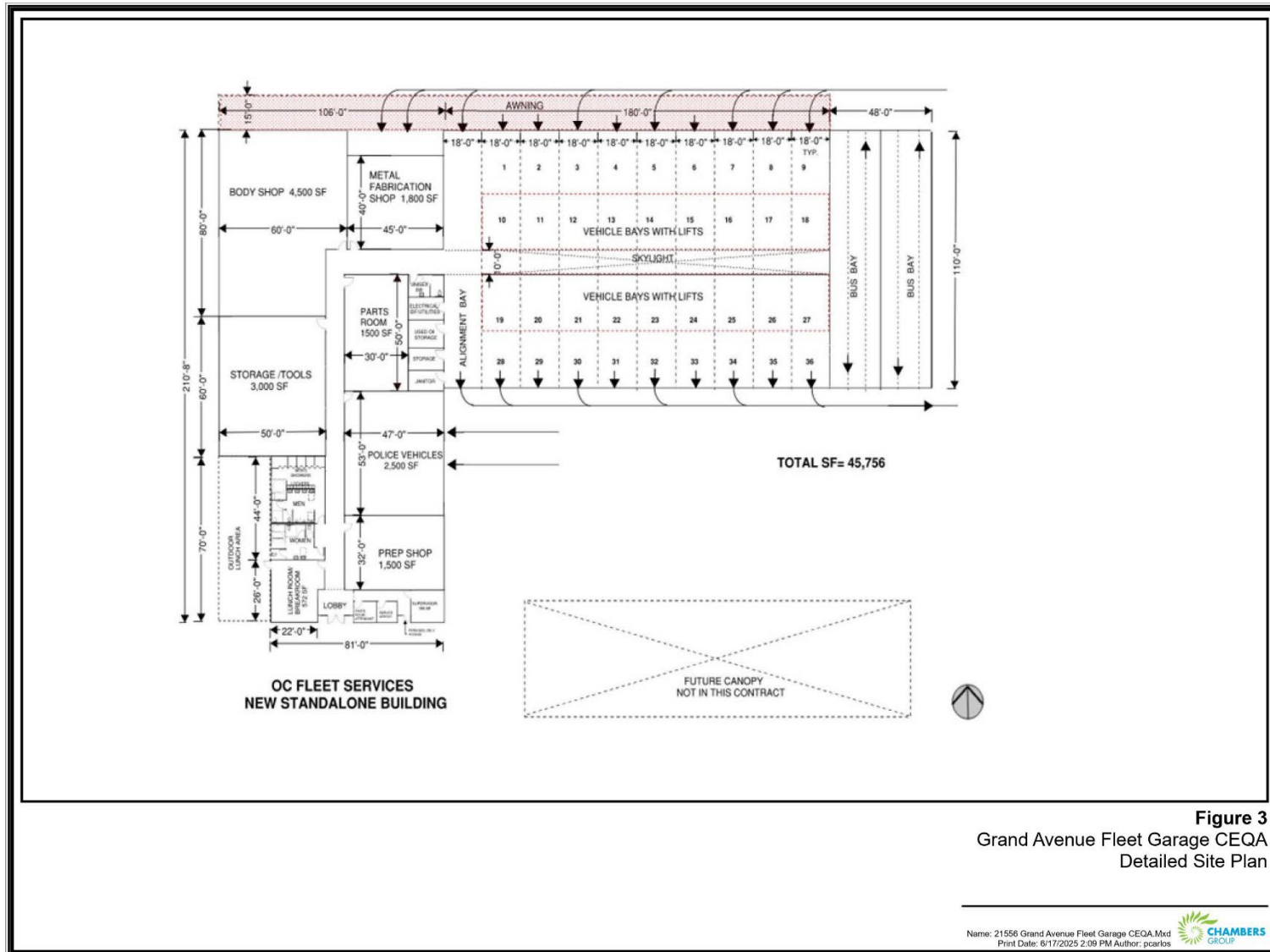
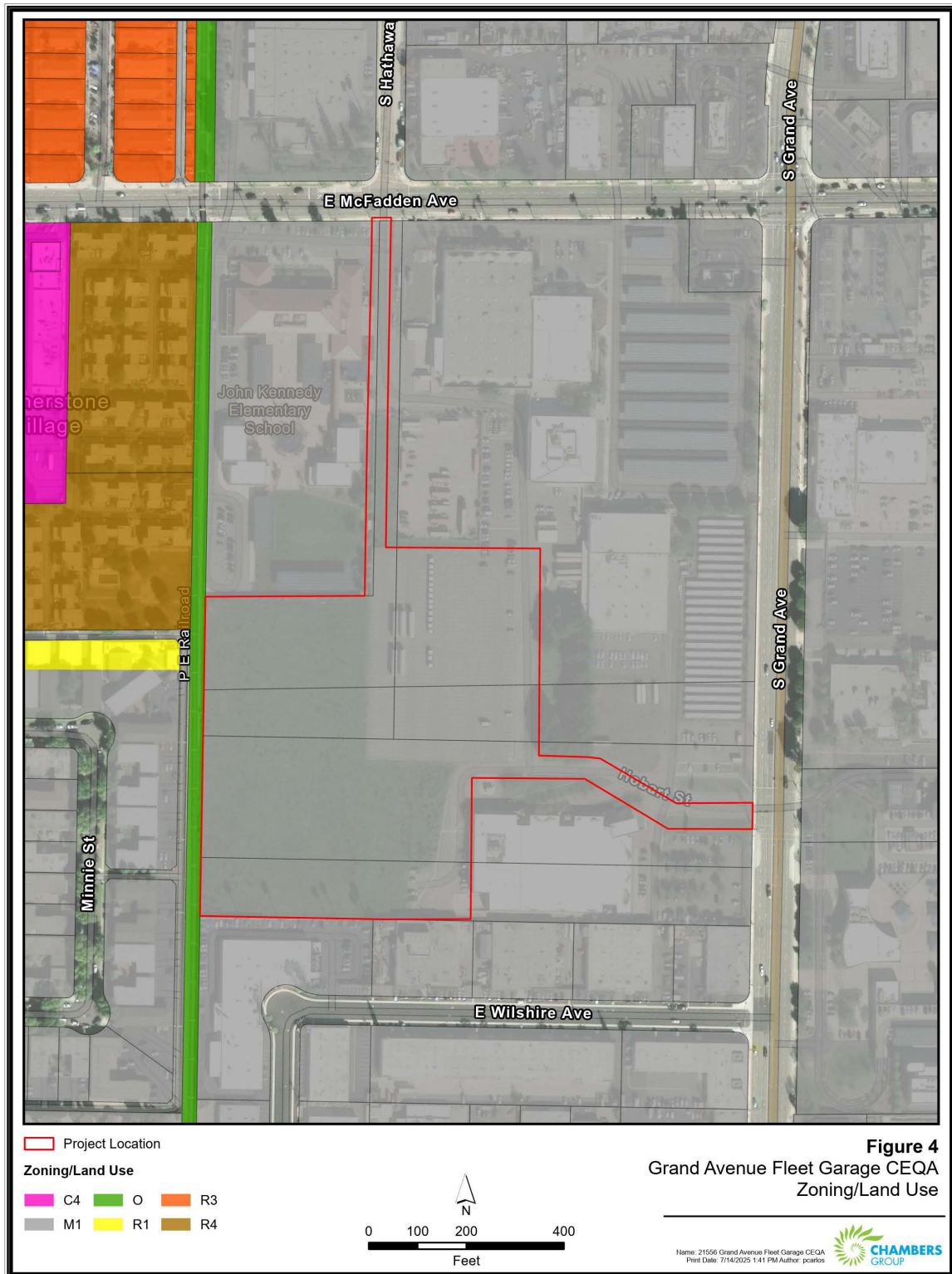


Figure 4 – Zoning/Land Use



2.8 REQUIRED PERMITS AND APPROVALS

County and other applicable agency approvals¹ required for implementation of the proposed Project will include, but are not limited to, the following:

County of Orange

- Adoption of CEQA Final IS/MND
- Board of Supervisors Approval of Construction Contract and Construction Management
- Approval of Water Quality Management Plan (WQMP)
- Approval of Plans, Specifications, and Estimates (PS&E)
- Temporary Construction Easements (TCEs), if necessary
- Site Plan review
- Grading Permit
- Building Permit

Orange County Fire Authority (OCFA)

- Fire Inspections – Site Access Only

Orange County Transportation Authority (OCTA)

- Encroachment permits

Santa Ana Regional Water Quality Control Board (RWQCB)

- National Pollutant Discharge Elimination System (NPDES) Construction General Permit
- Section 401 Water Quality Certification

State Fire Marshal

- Plans and Specifications

Various Utility Companies

- Encroachment Permits
- Easements

¹ The Proposed Project would be implemented by the County of Orange on County-owned property within the City of Santa Ana. As a governmental project, the County is generally not subject to the City's discretionary land use approval and zoning requirements under California law. Accordingly, no discretionary planning approvals from the City of Santa Ana are required for implementation of the Project.

2.9 CALIFORNIA NATIVE AMERICAN CONSULTATION

The County mailed initial consultation notification letters on August 21, 2025, to the California Native American Tribes listed below pursuant to Assembly Bill (AB) 52. Refer to Section 4.22, Tribal Cultural Resources, of this IS/MND for further discussion.

- Gabrieleño Band of Mission Indians - Kizh Nation
- Juaneño Band of Mission Indians
- Gabrieleño Tongva San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians

SECTION 3.0 – ENVIRONMENTAL DETERMINATION

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

3.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find that although the 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. ☒
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. 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. ☐
5. 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. ☐

DocuSigned by:
Virginia Gomez
ED76DCA58AD94B6

Signature

Virginia Gomez
Name

8/24/2026 | 9:38 AM PDT

Date

Senior Planner
Title

SECTION 4.0 – 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. 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 offsite as well as onsite, 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 substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration Section 15063(c)(3)(D) of the CEQA Guidelines. In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. 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 significant.

Mitigation measures, regulatory compliance measures, and standard conditions are defined below:

- **Regulatory Compliance Measure (RCM):** A regulatory compliance measure is mandated by federal, State, regional, or local statutes and regulations. Because a regulatory compliance measure is derived from a legal requirement, it is applicable to all projects within a particular jurisdiction. A regulatory compliance measure is therefore not necessarily specific to individual projects and can be applicable regardless of whether any potentially significant impacts would occur under a proposed project. Failure to comply with a regulatory compliance measure could result in legal action against a project.
- **Standard Condition (SC):** A standard condition, or standard condition of approval, is established by a lead agency, in this case the County, and can be applicable to any project subject to discretionary approval by the lead agency. A standard condition is therefore not specific to individual projects and can be applicable regardless of whether any potentially significant impacts would occur under a proposed project. Failure to comply with a lead agency's standard condition(s), if applicable, can lead to revocation of permits or other consequences.
- **Mitigation Measure (MM):** As defined in *State CEQA Guidelines* Section 15126.4, a mitigation measure is a measure that could minimize significant adverse impacts of a proposed project and is required when significant adverse impacts could potentially occur. A mitigation measure is fully enforceable through permit conditions, agreements, or other legally-binding instruments, and is often tracked through a Mitigation Monitoring and Reporting Program (MMRP).

SECTION 5.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

5.1 AESTHETICS

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

5.1.1 Impact Analysis

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

No Impact. According to the County's Resources Element of the General Plan, open space is defined as land that is preserved for various purposes, including conservation of natural resources, recreational activities, and the protection of scenic vistas. In addition, the County's Transportation Element designates Viewscape Corridor as routes which traverse a corridor within which unique or unusual scenic resources and aesthetic values are found. Landscape Corridors traverse developed or developing areas and have been designated for special treatment to provide a pleasant driving environment as well as community enhancement.

According to the Resources Element, the Project site is not designated, nor adjacent to a designated open space area that contains scenic vistas (County 2025). Additionally, according to the County's Scenic Highway Plan, there are no Landscape Corridors or Viewscape Corridors within the City, thus there are none within the vicinity of the proposed Project. Therefore, the Project would have no impact on a designated scenic vista and no mitigation is required.

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

No Impact. As previously discussed in Section 5.1.1(a), the Project is not within sight of a designated Landscape Corridor or Viewscape Corridor (County 2025). Furthermore, the Project is not within or adjacent to an official or eligible California State Scenic Highway. The nearest Officially Designated scenic highway is a segment of Route 91, located 7.75 miles north of the Project site (Caltrans 2025). The nearest Eligible scenic highway is a segment of Route 1, located 8.5 miles southwest of the Project site (Caltrans 2025). Due to the distance and topography between the Project site and state scenic highways, the Project would not create any visual obtrusions of any trees, rock outcroppings, or

historic buildings within a state scenic highway. No impact would occur towards a state scenic highway and no mitigation is required.

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

Less than Significant Impact. The majority of the existing Project site is a flat, undeveloped parcel consisting primarily consisting of non-native and ruderal vegetation resulting from prior land disturbance. Google Earth aerial imagery from 2017 also indicates the presence of vehicle tire marks across the site, suggesting past vehicular disturbance (Google 2025). The proposed access road area off McFadden Avenue currently consists of an asphalt driveway, disturbed vegetation, and a parking lot. The proposed access road off Grand Avenue currently consists of an asphalt driveway, a parking lot, and disturbed vegetation. Parcels adjacent to the Project site include existing County-owned and operated lots. The overall site area is a County business center, surrounded by train tracks and driveways, roads, commercial area, and school.

Construction activities associated with the Project would require the use of construction equipment and storage of materials on-site. Construction equipment, activities, and construction features that include demolition materials, excavated areas, stockpiled soils, and other materials generated and stored on-site would be present during construction. However, Project construction would be temporary in nature and the equipment used would be visually compatible with the surrounding industrial and commercial uses.

The surrounding vicinity of the Project to the immediate north, south, and east is highly urbanized and industrial. View corridors along Grand Avenue and McFadden Avenue primarily consist of street trees and urban and industrial developments. The Project would not be visible from these public vantage points given the existing intervening development. Proposed development would be visible from John F. Kennedy (JFK) Elementary School located immediately north, and rail transit users and residences located west. However, the Project would be visually compatible in height and appearance to the surrounding industrial and urban development. In addition, the proposed landscaping features, described in Section 2.6.4, would enhance the visual quality of the proposed Project. The proposed 12-foot noise wall would also provide a visual buffer between the Project site and the adjacent railroad, residences, and elementary school.

Construction and operation of the Project would not conflict with the applicable zoning or other regulations governing scenic quality. The proposed Project is consistent with the site's light industrial zoning designation. Therefore, a less than significant impact on visual character and public views would occur and no mitigation is required.

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

Less than Significant Impact. The Project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area and adjacent properties. Artificial light sources from the surrounding properties include interior and exterior lighting for security and incidental landscape lighting. Automobile headlights, streetlights, and stoplights for visibility and safety

purposes along Grand Avenue and McFadden Avenue contribute to overall ambient lighting levels as well.

Per County Code Section 7-9-67, the all lighting for the Project is required to be designed to confine direct rays to the premises. Lighting of the proposed structure and associated parking would consist of exterior building-mounted fixtures and pole-mounted lights within the parking area. All lighting would be designed to provide adequate illumination for safety and security while minimizing spillover onto adjacent properties. Fixtures would be shielded and directed downward, consistent with applicable local lighting. High efficiency lighting and controls and abundant use of natural light and daylight harvesting would be incorporated into the site design.

With required adherence to the County Code and given the illumination of the Project vicinity under existing conditions, the proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the surrounding urban area. Light and glare impacts would be less than significant and no mitigation is required.

5.2 AGRICULTURE & FORESTRY RESOURCES

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

2.	AGRICULTURE & FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or the conversion of forest land to non-forest use?	☐	☐	☐	☒

5.2.1 Impact Analysis

- a) *Would the project 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 nonagricultural use?*

No Impact. The majority of the existing Project site is a flat, undeveloped parcel consisting primarily of non-native and ruderal vegetation resulting from prior land disturbance. Google Earth aerial imagery from 2017 also indicates the presence of vehicle tire marks across the site, suggesting past vehicular disturbance (Google 2025). The proposed access road area off McFadden Avenue consists of a driveway, disturbed vegetation, and a parking lot. Similarly, the proposed access road off Grand Avenue consists of a driveway, a parking lot, and disturbed vegetation. Parcels adjacent to the Project site include existing County-owned and operated lots. The overall site area consists of a County business center, surrounded by train tracks and driveways, roads, commercial area, and a school.

According to the California Department of Conservation (DOC) Important Farmland Finder map, the Project site is situated within an area designated as Urban and Built-up Land and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2022). The existing Project site consists of bare ground and ruderal vegetation, thus does not support agricultural uses. Therefore, no impact would occur towards Farmland and no mitigation is required.

- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. According to the DOC California Williamson Act Enrollment Finder, the County did not report any Williamson Act data in 2024 (DOC 2024a). The existing Project site consists of development and ruderal vegetation, thus does not support agricultural uses. No impact would occur towards agricultural or Williamson Act lands and no mitigation is required.

- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. The Project site is zoned as M1, does not contain and is not located within an area zoned for forest land, timberland, or timberland zoned Timberland Production, nor would it result in rezoning of these resources. Therefore, no impact to forest land would occur and no mitigation is required.

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

No Impact. As described in Threshold c) above, the Project site does not contain forest land and is zoned for light industrial uses. Accordingly, the proposed Project would not result in the loss or conversion of forest land into non-forest use. No impact on forest land would occur and no mitigation is required.

- e) *Would the project 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 the conversion of forest land to non-forest use?*

No Impact. As previously discussed in Thresholds a), b), and c) above, the Project site does not contain, is not zoned for, nor is it designated as Farmland or forest land. The Project site is disturbed, consists of ruderal vegetation, thus it does not support agricultural uses or contain forest land. No impact would occur towards Farmland or forest land and no mitigation is required.

5.3 AIR QUALITY

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

5.3.1 Impact Analysis

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

Less than Significant Impact. An Air Quality, Energy, and Greenhouse Gas (GHG) Emissions Impact Analysis (Air Report - November 5th, 2025) was prepared by Vista Environmental in support of the

proposed Project (Appendix A). The following discussion summarizes the analysis contained in the Air Report.

The regional plan that applies to the proposed Project is the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed Project with the AQMP and discusses whether the proposed Project would interfere with the region's ability to comply with federal and state air quality standards. If the decision-makers determine that the proposed Project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed Project is considered consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in Section 5.3.1, Threshold b) below, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance or local thresholds of significance. The ongoing operation of the proposed Project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not be projected to exceed the air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Therefore, based on the information provided above, the proposed Project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed Project with the assumptions in the 2022 AQMP, which is the most current adopted AQMP. The emphasis on this criterion is to ensure that the analyses conducted for the proposed Project are based on the same forecasts as the AQMP. The 2022 AQMP was developed through use of the planning forecasts provided in the Connect SoCal and 2019 Federal Transportation Improvement Program (FTIP), which was the most current FTIP when the 2022 AQMP was prepared. The 2025 FTIP is the most current FTIP. Local governments are required to use these plans as the basis of their plans for

the purpose of consistency with applicable regional plans under CEQA. For this Project, the City of Santa Ana General Plan Land Use Map defines the assumptions that are represented in AQMP.

The Project site is currently designated as IND in the City General Plan. The proposed Project consists of development of a Fleet Services Building that would consolidate existing operations that occur in two locations into one facility, Facilities Operations Building, solar panel canopy, surface parking spaces, extended access road, and a disposal lot. The proposed Project is an allowed use within the current land use designation. As such, the proposed Project is not anticipated to exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed Project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP and no mitigation is required.

- b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (Appendix A):

“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is $HI > 1.0$ while the cumulative (facility- wide) is $HI > 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD’s recommended daily thresholds for Project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for Project-specific impacts would be considered cumulatively considerable. The following section calculates the potential air emissions associated with the construction and operations of the proposed project and compares the emissions to the SCAQMD standards.

Construction Emissions

The construction activities for the proposed Project are anticipated to include the site preparation and grading of the Project site, building construction of the Fleet Services Building, Facilities Operations Building, and solar panel canopy, paving of the on-site roads, disposal lot, and parking areas, and application of architectural coatings. The CalEEMod model (Version 2022.1, the most recent version) has been utilized to calculate the construction-related emissions from the proposed Project and the input parameters utilized in this analysis have been detailed in Section 8.1 of the Air Report. The thresholds of significance are discussed in Section 9.0 of the Air Report.

The maximum daily regional construction-related criteria for pollutant emissions from the proposed Project are shown in the table below, which corresponds to emissions values during the seasons that maximum daily pollutant emissions occur.

Table 4. Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Maximum Daily Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Daily Summer Maximum						
2026	3.20	29.3	29.8	0.05	6.86	3.85
2027	1.11	9.85	14.4	0.03	0.78	0.42
Daily Winter Maximum						
2026	1.16	10.4	14.3	0.03	0.82	0.46
2027	26.1	9.87	14.2	0.03	0.78	0.42
Maximum Daily Construction Emissions	26.1	29.3	29.8	0.05	6.86	3.85
SCQAMD Regional Thresholds	75	100	550	150	150	55
SCAQMD Local Thresholds¹	--	174	1,179	--	12	7
Exceeds Thresholds?	No	No	No	No	No	No

Notes:

¹ The nearest off-site sensitive receptor is the JFK Elementary School that is adjacent to the north side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold. Calculated from SCAQMD's Mass Rate Look-up Tables for 4.59 acres interpolated from two and five acres in Air Monitoring Area 17, Central Orange County.

Source: CalEEMod Version 2022.1.

The table above shows that none of the analyzed criteria pollutants would exceed the regional emissions threshold during construction of the proposed Project. It also shows that the proposed Project's regional construction-related criteria pollutant emissions that consist of both on-site and off-site emissions sources would not exceed the local thresholds, which provides for a worst-case analysis, since the local thresholds are for analyzing only the emissions created on-site. Therefore, a less than significant regional or local air quality impact would occur from construction of the proposed Project.

Operational Emissions

The OC Fleet Services offices are currently located at 445 Civic Center West and 1102 East Fruit Street in the City of Santa Ana. The proposed Project would consist of the relocation and consolidation of the two existing facilities services into the proposed fleet services building. As such, operation of the proposed Project would likely result in a decrease in emissions over existing conditions, with the development of a more-energy efficient building and increased efficiency through consolidation of activities into one facility. However, this analysis does not consider the operational emissions

currently being created by the two existing locations, in order to provide a conservative or worst-case analysis of the proposed Project.

Long-term air quality emissions from the proposed Project would be due to emissions from onsite area sources and energy usage emissions created from the on-going use of the proposed Project. The operations-related regional criteria air quality impacts created by the proposed Project have been analyzed through use of the CalEEMod model and the input parameters utilized in this analysis have been detailed in Section 8.1 of the Air Report. The thresholds of significance are discussed in Section 9.0 of the Air Report. The worst-case summer or winter VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} daily emissions created from the proposed Project's long-term operations have been calculated and are summarized in the table below and the CalEEMod emissions printouts are shown in Appendix A of the Air Report.

Table 5. Operational Criteria Pollutant Emissions

Emissions Source	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile Sources ¹	1.30	0.73	7.30	0.02	1.50	0.40
Area Sources ²	2.10	0.03	3.30	<0.01	0.01	<0.01
Energy Usage ³	0.04	0.66	0.56	<0.01	0.05	0.05
Total Emissions	3.44	1.42	11.16	0.02	1.56	0.45
SCQAMD Regional Thresholds	55	55	550	150	150	55
SCAQMD Local Thresholds	--	174	1,179	--	3	2
Exceeds Thresholds?	No	No	No	No	No	No

Notes:

¹ Mobile sources consist of emissions from vehicles and road dust.

² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of emissions from natural gas usage.

Source: Calculated from CalEEMod Version 2022.1.

The data provided in the table above shows that none of the analyzed criteria pollutants would exceed either the regional or local emissions thresholds during operation of the proposed Project. Therefore, a less than significant regional and local air quality impact would occur from operation of the proposed Project.

Local Carbon Monoxide Hotspot Impacts from Project-Generated Vehicular Trips

Carbon Monoxide (CO) is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the state and federal CO standards of 20 ppm over one hour or 9 ppm over 8 hours.

At the time of the SCAQMD 1993 Handbook, the Air Basin was designated nonattainment under the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated as an attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not

predict a violation of CO standards. Since the nearby intersections to the proposed Project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot is anticipated to be created from the proposed Project and no CO Hotspot modeling was performed. Therefore, a less than significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed Project.

Therefore, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant; impacts would be less than significant and no mitigation is required.

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

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report.

The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed Project, which may expose sensitive receptors to substantial concentrations have been calculated above in Threshold b) for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions. The nearest sensitive receptor to the project site is the JFK Elementary School that is adjacent to the north side of the Project site. There are also multi-family homes that are as near as 95 feet west of the Project site.

Construction-Related Sensitive Receptor Impacts

The construction activities for the proposed Project are anticipated to include the site preparation and grading of the Project site, building construction of the Fleet Services Building, Facilities Operations Building, and solar panel canopy, paving of the onsite roads, disposal lot, and parking areas, and application of architectural coatings. Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from onsite construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the proposed Project have been analyzed above in Threshold b) and found that the construction of the proposed Project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} thresholds of significance. Therefore, construction of the proposed Project would create a less than significant construction-related impact on local air quality and no mitigation would be required.

Toxic Air Contaminants Impacts from Construction

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology (Appendix A). It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors (Appendix A).

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed Project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than 5 minutes, requires equipment operators to label each piece of equipment and provide annual reports to California Air Resources Board (CARB) of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. By January 2026, 75 percent or more of all contractors' equipment fleets must be Tier 2 or higher and by January 2029, 100 percent of all equipment fleets must be Tier 2 or higher. Therefore, no significant short-term DPM impacts would occur during construction of the proposed Project and no mitigation is required.

Operations-Related Sensitive Receptor Impacts

The on-going operations of the proposed Project may expose sensitive receptors to substantial pollutant concentrations of local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from on-site operations. The following analyzes the vehicular CO emissions. Local criteria pollutant impacts from on-site operations, and TAC impacts.

Local CO Hotspot Impacts from Project-Generated Vehicle Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. The analysis provided above in Threshold b) shows that no local CO Hotspots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the proposed Project. Therefore, operation of the proposed Project would result in a less than significant exposure of off-site sensitive receptors to substantial pollutant concentrations and no mitigation is required.

Local Criteria Pollutant Impacts from On-site Operations

The local air quality impacts from the operation of the proposed Project would occur from on-site sources such as architectural coatings and landscaping equipment. The analysis provided above in Threshold b) found that the operation of the proposed Project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} thresholds of significance. Therefore, the on-going operations of the proposed Project would create a less than significant operations-related impact on local air quality due to on-site emissions and no mitigation would be required.

Operations-Related TAC Impacts

The proposed Project consists of development of a new fleet services facility that would generate DPM emissions from the servicing of diesel vehicles and from diesel vehicle trips to and from the Project site. PM from diesel exhaust is the predominant TAC in most areas and according to The California Almanac of Emissions and Air Quality 2013 Edition, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust (Appendix A). Some chemicals in diesel exhaust, such as benzene and formaldehyde have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program.

According to the 2020 CEQA California Environmental Quality Act Statute & Guidelines (State CEQA Guidelines), Appendix M provides the performance standards for infill projects eligible for streamlined reviews and states the following:

“Significant sources of air pollution” include airports, marine ports, rail yards and distribution centers that receive more than 100 heavy-duty truck visits per day, as well as stationary sources that are designated major by the Clean Air Act.”

In addition, the Health Risk Assessments (HRA) for Proposed Land Use Project, prepared by California Air Pollution Control Officers Association (CAPCOA), July 2009, details that a potentially significant impact may occur if sensitive receptors are placed within 1,000 feet of distribution centers that generate more than 100 trucks deliveries per day. As detailed above in Section 8.1, the proposed Project consists of the consolidation of two existing facilities that are located within 2 miles of the project site into the proposed facility. The new fleet services facility will relocate approximately 150 daily vehicle trips (in and out). According to Orange County Public Works (OCPW) staff, less than 5 percent of the fleet is diesel-powered or approximately 7.5 daily trips to the Project site would be from diesel-powered vehicles, which is well below both the state CEQA Guidelines and CAPCOA guidelines provided above for when a potentially significant health risk impact would occur from diesel vehicle emissions. Based on the above reasons it can be reasonably concluded that the DPM emissions created from the on-going operation of the proposed Project would result in a less than significant TAC impact to the nearby sensitive receptors and no mitigation would be required.

- d) *Would the project result in other emissions, such as those leading to odors adversely affecting a substantial number of people?*

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report.

Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in an ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits Volatile Organic Compounds (VOC) content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The proposed Project would consist of development of a Fleet Services Building, Facilities Operations Building, solar panel canopy, surface parking spaces, extended access road, and a disposal lot. Potential sources that may emit odors during the on-going operations of the proposed Project would primarily occur from the trash storage areas and from the use of fuels associated with servicing vehicles. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. The use of fuels on-site will be required to meet SCAQMD's Rule 461 requirements that require the use of dispensing equipment that minimizes vapor and liquid leaks that will also minimize odor impacts. Due to the distance of the nearest receptors from the project site (immediately adjacent JFK Elementary School and multi-family homes 55 feet west) and through compliance with SCAQMD's Rules 402 and 461, City trash storage regulations, a less than significant impact related to odors would occur during the on-going operations of the proposed Project and no mitigation is required.

5.4 BIOLOGICAL RESOURCES

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

5.4.1 Impact Analysis

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

Less than Significant. Impact. On October 28, 2025, a Biological Reconnaissance Survey Report (Biology Report) was prepared by Chambers Group in support of the proposed Project. The Biology Report is attached as Appendix B.

Based on the literature review (see Section 4.1 of the Biology Report) and field survey conducted for the Project, there are 44 special status plant species with a potential to occur on or within the vicinity of the Project site based on habitat present and a 5-mile radius of the Project site. Ten of these 44 special status plant species are federal- and/or state-listed as endangered or threatened.

Of the 44 plant species, 26 species are considered absent from the proposed Project site due to lack of suitable habitat, lack of suitable soil types and/or typically occur outside the elevation range on-site. Twelve of the 44 plant species can occur in disturbed, meadow and grassland habitat, but are

considered absent from the proposed Project site due to level of repeated disturbance in the area and lack of observation on-site. Six of the 44 plant species are presumed to be locally extinct and are absent from the proposed Project site because there is a lack of suitable habitat, depleted seed bank in the surrounding area, and recent records are greater than 5 miles away from the proposed Project site and/or are more than 40 years old. Of the 44 special status plant species evaluated for their potential occurrence on the Project site, all 44 species were not observed and are considered absent from the site.

Based on the literature review and field survey conducted for the Project, 14 special status wildlife species have potential to occur on or within the vicinity of the Project site. These special status wildlife species are federal- and/or state-listed as endangered or threatened, federally proposed threatened, or state candidate endangered. None of these sensitive wildlife species were observed within the Project site.

Six of the 14 wildlife species are considered absent because of the highly developed, urbanized conditions of the Project site and lack of native vegetation or natural habitat. Three of the 14 wildlife species are considered absent because the Project site lacks required hydrological features such as streams, rivers, riparian corridors, or standing freshwater habitats. Two of the 14 wildlife species are considered absent because the site lacks the appropriate soil conditions, host plants, or specific habitat features required for the species are not present. Two of the 14 wildlife species are considered absent because the Project site lacks roosting, foraging, or structural habitat needed by the species. One of the 14 wildlife species, Burrowing Owl (*Athene cunicularia*), has a low potential to occur because the Project site contains minimal marginal habitat features such as small debris piles and landscape outside of the Project site boundaries to provide foraging opportunities. There are ground squirrel burrows on-site, but they are active with squirrels and in pore areas for a burrowing owl to occupy.

The Project site primarily contains non-native, ornamental, ruderal vegetation that provides little to no habitat value for special status plants or wildlife species. Furthermore, no special status species were identified during the field survey. Therefore, a less than significant impact towards sensitive species would occur and no project specific mitigation is required.

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

No Impact. According to the Biology Report, the Project site is fully characterized by disturbed ruderal vegetation, ornamental landscaping, and developed areas. The Project site's ruderal vegetation occupies approximately 5.92 acres and occurs primarily within the southwestern field and the north-south corridor between buildings. These areas consist of disturbed, compacted soils supporting pioneering herbaceous species adapted to frequent disturbance, including Bermuda grass, cheeseweed, Russian thistle, and Johnsongrass. Smaller patches of ornamental landscaping, totaling about 0.61 acre, are present along the southern, eastern, and northwestern perimeters of the site and are characterized by non-native horticultural species such as silk floss tree, star jasmine, pomegranate, bougainvillea, and carrotwood. In addition, developed areas account for approximately 4.99 acres of the site and include man-made features such as buildings, parking areas, and two asphalt road entrances located off Grand Avenue and McFadden Avenue, with a developed parking lot adjacent to the ruderal vegetation on the eastern portion of the site. No California Department of Fish and Wildlife (CDFW) or United States Department of Fish and Wildlife (USFWS) designated riparian

habitat, other sensitive natural communities, natural drainage features or intact native plant communities are present on the Project site, and were not observed during the field survey.

The USFWS designates critical habitat for the coastal California gnatcatcher approximately 4.7 miles from the Project site. However, no suitable habitat for coastal California gnatcatcher occurs within or adjacent to the Project site due to the highly developed and urbanized condition surrounding the area. No impacts on USFWS critical habitat will occur as a result of the Project and no mitigation is required.

Due to the lack of riparian habitat or other sensitive natural community within the Project site, no impact would occur and no mitigation is required.

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

No Impact. The Project would not have a substantial adverse effect on state or federally protected wetlands or other aquatic resources through direct removal, filling, hydrological interruption, or other means. As discussed in the Biology Report, the Project site does not contain wetlands or other potential jurisdictional waters and is fully developed, with no natural drainages, washes, or evidence of an ordinary high-water mark (OHWM). A site inspection conducted on October 28, 2025, identified no surface hydrology features, including channels, depressions, or culverts, that would support wetland or hydric conditions, and no wetland indicator vegetation, hydric soils, or wetland hydrology indicators were observed. Vegetation across the site consists primarily of developed areas and non-native landscaping typical of an urbanized environment. Two concrete storm drains located along the southern entrance road are engineered features designed to convey runoff and do not function as natural watercourses. Because no wetlands or aquatic resources are present on the Project site, no permits or approvals under Section 404 of the Clean Water Act or Section 1602 of the California Fish and Game Code would be required, and implementation of the Project would not result in impacts to state- or federally protected wetlands. No mitigation is required.

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

No Impact. As discussed in the Biology Report, the Project site does not function as a wildlife movement corridor. The proposed Project would construct a new Fleet Facility and provide County vehicle maintenance services. The surrounding area is highly urbanized and fragmented, bordered by train tracks, residential developments, schools, and commercial businesses. These existing barriers substantially limit wildlife movement and connectivity. As a result, the site does not provide a continuous or viable pathway for wildlife species to travel between habitat areas. No impact towards migratory species would occur and no mitigation is required.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

e & f) No Impact. The proposed Project does not conflict with any local policies or ordinances protecting biological resources as the General Plan Resources Element defers to the County of Orange (Central/Coastal) Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP). The Project site does not contain sensitive natural communities, wetlands, or riparian habitat subject to protection under the Orange County General Plan or NCCP/HCP (County 1996). There are no existing trees within the Project construction site boundary, thus no tree removal is proposed. The site is fully developed and characterized by disturbed ruderal vegetation, ornamental landscaping, and existing infrastructure, and the proposed Project would occur entirely within these previously disturbed areas. No impacts regarding a tree preservation policy, NCCP, or HCP would occur and no mitigation is required.

5.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

5.5.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

No Impact. A Cultural Resources Survey Letter Report (Appendix C: Cultural Report – October 10, 2025) was prepared by Chambers Group in support of the proposed Project.

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South-Central Coastal Information Center (SCCIC) at California State University, Fullerton, on May 30, 2025. A study area with a half-mile radius of the Project site was requested to provide additional context to the Project site and surrounding area. The SCCIC returned the records search results on June 26, 2025, providing information on all documented cultural resources and previous archaeological investigations within a half-mile radius of the Project site. Resources consulted during the records search conducted by the SCCIC included the National Register of Historic Places (NRHP), California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historical photographs, maps, and aerial imagery.

The study also included a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps.

The cultural resource assessment contained in the Cultural Report also included a field survey of the entire proposed Project site. The survey consisted of a systematic surface inspection site transected at no more than 15-meter intervals to ensure that any evidence of surface-exposed cultural materials and/or evidence of paleontological resources could be identified.

Based on the archival research, record searches, and field survey discussed in the Cultural Report, there are no historic resources within the Project site. Therefore, no impact would occur or would cause a substantial adverse change in the significance of a historical resource. No mitigation is required.

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

Less than Significant Impact. As discussed in the Cultural Report, based on the review of available historic maps and aerial imagery, Chambers Group archaeologists observed that the Project site was accessible by dirt road by 1896. The Project site was in use as orchard/agricultural land with small residential buildings associated by 1931, and continued in this arrangement until approximately 1970, when the first of the current buildings situated on Project parcels were developed. Subsequent development removed the remaining evidence of agricultural use by 1981.

Based on the CHRIS record search, no archaeological resources have been documented within the Project site. While no archaeological resources were apparent during the survey effort, there remains a potential for encountering buried cultural resources. Given the historic context, these are more likely to be historic-period materials associated with the prior use of the area for agricultural development such as agricultural equipment or related refuse. As the parcels associated with the Project site once supported at least two ranch houses and a well, it is possible that both infrastructure supporting and waste from the ranches could be encountered. Though not indicated during the survey, these items may take the form of refuse pits, foundations, building debris, or irrigation system items such as supply pipes, or drains.

In the event that archaeological resources are inadvertently discovered during Project construction activities, the County's Standard Conditions of Approval (SC) CUL-1 and CUL-2 requires that construction be halted in the vicinity of the find, a qualified archaeologist evaluates the discovery, appropriate notifications be made, and any necessary mitigation or treatment measures be implemented in accordance with applicable regulations. Impacts would be less than significant with implementation of SC's CUL-1 and CUL-2 and no mitigation is required.

SC CUL-1 The County shall retain the services of a Qualified Archaeologist, meeting the Secretary of the Interior Standards, and County requirements. The Qualified Archaeologist shall remain on call throughout the Project. The Qualified Archaeologist or cultural resources specialist working under the direction of the Qualified Archaeologist, shall provide an initial cultural resources sensitivity training (which may be incorporated within a more comprehensive or multi-discipline Worker Environmental Awareness Program [WEAP]) to inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The cultural resources sensitivity training is necessary to inform the construction personnel of the potential to encounter buried cultural resources and provide examples of potential cultural materials that may

be encountered. The training shall be held in conjunction with the Project's initial on-site safety meeting and shall explain the applicable protocols, procedures, and legal basis for the protection of significant archaeological resources.

SC CUL-2 In the event of an inadvertent discovery of potential cultural resources (artifacts or features) during ground-disturbing activities, construction activities within a 50-foot radius of the discovery shall be halted while the Qualified Archaeologist assesses the find. The archaeologist shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify avoidance or other measures as appropriate. If the resource is determined to be significant or unique through significance evaluation, and avoidance is not possible, appropriate mitigation or treatment shall be established and implemented. These might include a cultural resources mitigation and monitoring plan, treatment plans, or data recovery programs. All monitoring or associated plans would be prepared and implemented under the direction of the Qualified Archaeologist. All required close-out reporting or archaeological site records would be completed in accordance with the Office of Historic Preservation's guidelines and submitted to the appropriate CHRIS Information Center (IC), as necessary.

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

Less than Significant Impact. No historic burial sites have been documented within the Project site or vicinity (Appendix C). In the event that human remains are discovered during ground-disturbing activities, the proposed Project would be subject to California Health and Safety Code § 7050.5, CEQA Guidelines § 15064.5, and California PRC § 5097.98. If human remains are found during ground-disturbing activities, State of California Health and Safety Code § 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC § 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials (Appendix C). Compliance with existing regulations and Regulatory Compliance Measure (RCM) CUL-1 pertaining to the discovery of human remains would result in less than significant impacts. No mitigation is required.

Regulatory Compliance Measure:

RCM CUL-1 Human Remains. In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of CCR Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the NAHC, which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials.

Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the Orange County Public Works Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

5.6 ENERGY

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

5.6.1 Impact Analysis

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

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report (Appendix A).

The proposed Project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity, natural gas, and petroleum-based fuel supplies and distribution systems. This analysis includes a discussion of the potential energy impacts of the proposed Project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. A general definition of each of these energy resources is provided below.

See Appendix A for definitions of electricity, natural gas, and petroleum-based fuels. In 2024, Orange County consumed 19,225 Gigawatt-hours per year of electricity and 561.7 million Therms of natural gas (Appendix A). In 2023, 1,150 million gallons of gasoline and 62 million gallons of diesel were sold in Orange County (Appendix A).

The following section calculates the potential energy consumption associated with the construction and operations of the proposed Project and provides a determination if any energy utilized by the proposed Project is wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy

The proposed Project would consume energy resources during construction in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery and haul truck trips (e.g. hauling of demolition material to off-site reuse and disposal facilities).
2. Electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power and any needed electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance); and,
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

During construction the proposed Project would consume electricity to construct the proposed structures. Electricity would be supplied to the Project site by Southern California Edison (SCE) and would be obtained from the existing electrical lines in the vicinity of the Project site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would minimize impacts on fuel consumption. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed Project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Since there are currently power lines in the vicinity of the Project site, it is anticipated that only nominal improvements would be required to SCE distribution lines and equipment with development of the proposed Project. Compliance with City's guidelines and requirements would ensure that the proposed Project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction of the Project. Construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding usages or utility system capacity.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the Project site and on-road automobiles transporting workers to and from the Project site and on-road trucks transporting equipment and supplies to the Project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions shown in Section 8.2 of the Air Report (Appendix A), which found that construction of the proposed Project would consume 7,334 gallons of gasoline and 46,907 gallons of diesel fuel. This equates to 0.0006 percent of the gasoline and 0.076 percent of the

diesel used annually in Orange County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates.

Construction activities associated with the proposed Project would be required to adhere to all state and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the proposed Project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete. It is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy

The on-going operation of the proposed Project would require the use of energy resources for multiple purposes including, but not limited to, HVAC, refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment, and vehicle trips. However, the Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Therefore, there is no net increase in energy usage expected to occur during operations.

Operations-Related Electricity

Operation of the proposed Project would result in consumption of electricity at the Project site. As detailed in Section 8.2 of the Air Report, the proposed Project would consume 821,132 kilowatt-hours per year of electricity, which does not account for the electricity that will be produced by the proposed 10,000 SF solar canopy. This equates to 0.0043 percent of the electricity consumed annually in Orange County. As such, the operation-related electricity use would be nominal, when compared to current electricity usage rates in the County.

In addition, the proposed Project would comply with all federal, state, and City requirements related to the consumption of electricity, including CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation, use of energy efficient lighting and appliances, water and space heating systems, as well as requiring a variety of other energy-efficiency measures to be incorporated into the proposed Project. Therefore, it is anticipated that the proposed Project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the proposed Project's electricity demand. Thus, the Project would not result in the wasteful or inefficient use of electricity and no project-specific mitigation measures would be required.

Operations-Related Natural Gas

Operation of the proposed Project would result in increased consumption of natural gas at the Project site. As detailed in Section 8.2 of the Air Report, the proposed Project would consume 2,463 MBTU per year of natural gas. This equates to 0.0044 percent of the natural gas consumed annually in

Orange County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County.

In addition, the proposed Project would comply with all federal, state, and City requirements related to the consumption of natural gas, that includes CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed Project, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated that the proposed Project will be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the proposed Project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no project-specific mitigation measures would be required.

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the proposed Project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the Project site. As detailed in Section 8.2 of the Air Report, the proposed Project would consume 24,777 gallons of gasoline per year from vehicle travel. This equates to 0.02 percent of the gasoline consumed annually in Orange County. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates

In addition, the proposed Project would comply with all federal, state, County and City requirements related to the consumption of transportation energy that includes CCR Title 24, Part 10 California Green Building Standards that require conduit to be installed in the proposed parking areas for future EV charging stations. Therefore, it is anticipated that the proposed Project will be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles, and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the proposed Project's demand. Thus, impacts with regard transportation energy supply and infrastructure capacity would be less than significant and no project-specific mitigation measures would be required.

In conclusion, the proposed Project would comply with regulatory compliance measures outlined by the State, County and City related to air quality (see section 4.0 of the Air Report), energy (see section 5.0 of the Air Report), and GHGs (see section 6.0 of the Air Report). Additionally, the proposed Project would be constructed in accordance with all applicable County Building and Fire Codes. Therefore, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation; impacts would be less than significant and no mitigation is required.

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

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report (Appendix A).

The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plans for the proposed Project include the *Santa Ana General Plan Conservation Element*, adopted April 2022, and the County of Orange General Plan,

Chapter 6 Resources Element, September 13, 2005, that provides an Energy Resources Component. The City and County plans are analyzed separately below.

City of Santa Ana General Plan Conservation Element

The proposed Project's consistency with the energy conservation policies from the City's General Plan are shown in the table below.

Table 6. Proposed Project Compliance with the City General Plan Energy Policies

General Plan Policy	Proposed Project Implementation Actions
Goal CN-3: Energy Resources Reduce consumption of and reliance on nonrenewable energy and support the development and use of renewable energy sources.	
Policy CN-3.1: Interagency Coordination. Consult with regional agencies and utility companies to pursue energy efficiency goals and expand renewable energy strategies.	Not Applicable. This policy is for the City to implement.
Policy CN-3.2: Education Programs. Support education programs to provide information on energy conservation and alternatives to nonrenewable energy sources.	Not Applicable. This policy is for the City to implement.
Policy CN-3.3: Development Patterns. Promote energy-efficient development patterns by clustering mixed use developments and compatible uses adjacent to public transportation.	Consistent. The project will provide employment opportunities in close proximity to existing residential sites and there is existing Orange County Transportation Authority (OCTA) bus stops adjacent to the Project site on McFadden Avenue and Grand Avenue.
Policy CN-3.4: Site Design. Encourage site planning and subdivision design that incorporates the use of renewable energy systems.	Consistent. The proposed Project will include a 10,000 SF solar PV system.
Policy CN-3.5: Landscaping. Promote and encourage the planting of native and diverse tree species to improve air quality, reduce heat island effect, reduce energy consumption, and contribute to carbon mitigation with special focus in environmental justice areas.	Consistent. The proposed Landscape Plan will be designed to include native and diverse tree species that will be located adjacent to the onsite road system as well in the proposed parking lots, in order to reduce the heat island effect and associated reduction in energy consumption.
Policy CN-3.6: Life Cycle Costs. Encourage construction and building development practices that use renewable resources and life cycle costing in construction and operating decisions.	Consistent. The proposed Project will be constructed using renewable resources based on the Title 24 Part 6 and Part 11 building standards that require construction materials to be reused or recycled.
Policy CN-3.7: Energy Conservation Design and Construction. Incorporate energy conservation features in the design of new construction and rehabilitation projects.	Consistent. The proposed structures will be designed to meet or exceed the 2025 Title 24 Part 6 building standards that require the incorporation of energy conservation features into the structures.
Policy CN-3.8: Energy-Efficient Public Facilities. Promote and encourage efficient use of energy and the conservation of available resources in the design, construction, maintenance, and operation of public facilities, infrastructure, and equipment.	Consistent. The proposed public facilities will be designed to meet or exceed the 2025 Title 24 Part 6 building standards that require the incorporation of energy conservation features into the structures.
Policy CN-3.9: Energy Generation in Public Facilities. Encourage and support the generation, transmission, use, and storage of locally distributed renewable energy in	Consistent. The proposed public facility will include a 10,000 SF solar PV canopy system.

General Plan Policy	Proposed Project Implementation Actions
order to promote energy independence, efficiency, and sustainability.	
Policy CN-3.10: Energy Conservation in Public Projects. Work with businesses and contractors that use energy-efficient practices in the provision of services and equipment for City construction projects.	Not Applicable. This policy is for City construction projects.
Policy CN-3.11: Energy-Efficient Transportation Infrastructure. Continue to support public and private infrastructure for public transportation such as bus routes, rail lines, and the OC Streetcar.	Consistent. There is existing OCTA bus stops adjacent to the Project site on McFadden Avenue and Grand Avenue.
Source: City of Santa Ana, 2022.	

As shown above, the proposed Project would be consistent with the energy conservation policies from the General Plan Conservation Element. Therefore, the proposed Project would not conflict with the City's plan for renewable energy or energy efficiency. Impacts would be less than significant.

County of Orange General Plan Resource Element

The proposed Project's consistency with the applicable energy-related policies in the County's General Plan are shown in the table below.

Table 7. Proposed Project Compliance with County General Plan Energy Policies

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
Policy 1 – Land Use. To plan urban land uses with a balance of residential, industrial, commercial, and public land uses as set forth in the Land Use Element.	Consistent. The proposed Project is an allowed use under the current land use designation of Industrial. In addition, the proposed Project is in close proximity to existing residential and retail uses, which will reduce energy usage by reducing vehicle trips.
Policy 2 – Energy Resource Development. To encourage and actively support the efficient use and optimum development of energy resources in the County consistent with sound resource management practices.	Not Applicable. This policy is only applicable for the development of energy resources. No known energy resources (i.e. oil wells or mining) exist on the Project site.
Policy 3 – Energy Conservation. To encourage and actively support the utilization of energy conservation measures in all new and existing structures in the County.	Consistent. The proposed Project has been designed to exceed the state's Title 24 energy efficiency standards and will incorporate several energy-efficiency design features into the Project.
Policy 4 – Transportation. To provide incentives for transportation system management programs and support regional public transportation programs that reduce energy consumption.	Not Applicable. This policy is only applicable to the County to develop regional transportation programs.
Policy 5 – Energy Financing. To examine the benefits of local government financing programs that promote energy conservation and development through cooperative public/private efforts.	Not Applicable. This policy is only applicable to the County to develop government financing programs that promote energy conservation.
Policy 6 – Alternative Energy Systems. To encourage the use of alternative energy systems and to the extent feasible, remove the regulatory barriers to their implementation.	Consistent. The proposed Project will include a 10,000 SF solar PV canopy system and will provide electric vehicle charging stations.

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
Policy 7 – Solar Access. To support and encourage voluntary efforts to provide solar access opportunities in new developments.	Consistent. The proposed Project will include a 10,000 SF solar PV canopy system.

Source: County of Orange, 2005.

As shown above, the proposed Project would be consistent with all applicable energy-related policies provided in the County’s General Plan. Therefore, the proposed Project would not conflict with the County’s plan for renewable energy or energy efficiency. Energy impacts would be less than significant and no mitigation is required.

5.7 GEOLOGY AND SOILS

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

5.7.1 Impact Analysis

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

Less than Significant Impact. According to the Department of Conservation (DOC) California Geologic Survey Earthquake Zones of Required Investigation, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone (DOC 2024b). The nearest Alquist-Priolo Earthquake Fault is located 8.5 miles southwest of the Project site. Given this distance, it is reasonable to assume that the risk of loss, injury, or death involving rupture of a known earthquake fault is low.

In addition, the Project must be designed and constructed in accordance with the California Building Standards Code (California Code of Regulations, Title 24), which incorporates seismic design provisions of the current California Building Code (CBC) and American Society of Civil Engineers Standard 7 (ASCE 7). These standards require that buildings be engineered to withstand anticipated seismic forces for their location, occupancy type, and soil conditions, including specific detailing for lateral force-resisting systems, foundation design, and structural ductility. Compliance with these requirements ensures that, even in the seismically active regions of Southern California, structures are designed to minimize the risk of loss, injury, or death in the event of ground rupture or shaking. Impacts related to rupture of a known earthquake fault would be less than significant and no mitigation is required.

- ii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Less than Significant Impact. As stated above in Section 5.7.1 Threshold a)i), the proposed Project is not located in the immediate vicinity of a state-designated Alquist-Priolo Earthquake Fault Zone and, therefore, is not considered susceptible to surface fault rupture hazards. However, the Project site is located within Southern California, which contains various active and inactive faults and is generally considered a seismically active region.

The closest surface trace of a potentially active fault to the Project site is the Newport-Inglewood-Rose-Canyon Fault Zone, which is located approximately 6 miles southwest of the Project site (DOC 2015).

Given the location of the nearest fault zone and general seismicity of Southern California, the Project site could be subject to strong ground shaking in the event of an earthquake. However, as previously discussed, the Project will be required to comply with structural design components of the CBC, which ensures buildings are engineered to withstand anticipated seismic forces. Compliance with applicable regulations would ensure that the Project would result in less than significant impacts regarding strong seismic ground shaking and no mitigation is required.

- iii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

Less than Significant Impact. According to the DOC's Earthquake Zones of Required Investigation, the Project site is within a liquefaction zone (DOC 2024b). The proposed Project would comply with Public Resources Code (PRC) Chapter 7.8 Section 2697 regarding projects located within a seismic hazard zone through RCM GEO-1, which requires the preparation of a geotechnical report defining and delineating any seismic hazard and recommended project design features.

Regulatory Compliance Measure:

RCM GEO-1 Geotechnical Investigation. Pursuant to PRC Chapter 7.8 Section 2697, prior to the approval of a project located in a seismic hazard zone, the Project proponent shall prepare a geotechnical report defining and delineating any seismic hazard. The County of Orange must have a site-specific geotechnical investigation conducted by a licensed professional to identify and evaluate the potential for seismic-related ground failure, including liquefaction, and to recommend appropriate design and construction project features or measures to be implemented for the Project.

In addition, the Project will comply with CBC standards, which requires that structures be designed to withstand the effects of ground shaking and ground failure, including the mitigation of liquefaction hazards through ground improvement, deep foundations, or other engineered solutions. Therefore, compliance with PRC and CBC would result in less than significant impacts regarding seismic-related ground failure, and no project-specific mitigation is required.

- iv) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

No impact. According to the DOC's Earthquake Zones of Required Investigation, the Project site is not within, nor adjacent to a Landslide Zone (DOC 2024b). There are no substantial hazards with respect to slope stability given the Project site and surrounding areas are mostly flat. No landslide-related impact would occur, and no project-specific mitigation is required.

- b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Less than Significant Impact. During grading of the Project site, soils may be prone to erosion due to wind or rain. Because the proposed Project would disturb more than one acre of undeveloped land, it is subject to the NPDES General Permit. Under the NPDES program, the Project applicant must prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that identifies potential sources of sediment and pollutants, specifies best management practices (BMPs) for erosion and sediment control, and outlines inspection and maintenance procedures to ensure effectiveness throughout construction. A comprehensive discussion of erosion and water quality from rain events can be found in Section 5.10, *Hydrology and Water Quality*. Therefore, compliance with existing regulations would result in less than significant impacts related to soil erosion or loss of topsoil. No mitigation is required

- c) *Would the project 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?*

Less than Significant Impact. As noted above in Section 5.7.1 Threshold a)iii) and Threshold a)iv), the Project site is within a liquefaction hazard zone but not within a mapped Landslide Zone (DOC 2024b). With implementation of RCM GEO-1 a site-specific geotechnical investigation prepared by a licensed professional for the proposed Project will address the potential for liquefaction on-site and recommend required design features or measures for implementation.

In addition, the Project will comply with CBC standards pertaining to seismic design criteria and foundation/soil stability requirements intended to ensure that structures are designed to resist the effects of ground shaking, ground failure, and soil instability. With adherence to existing regulations and implementation of RCM GEO-1, impacts related to unstable geologic units would be less than significant and no mitigation is required.

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

Less than Significant Impact. According to the United States Department of Agriculture (USDA), the Project site is situated on “Chino silty clay loam, drained” and “Mocho loam, 0 to 2 percent slopes, warm mean annual air temperature (MAAT), Major Land Resource Area (MLRA) 19” (USDA 2024). These soils have a Hydrologic Soil Group rating of C and B, respectively. According to Chapter 7 of the USDA’s Hydrology National Engineering Handbook, soils with a Hydrologic Soil Group rating of D have high shrink-swell (expansive) properties (USDA 2009). Because the Project site soils are rated B and C, they are not classified as highly expansive, although some minor shrink-swell behavior may occur under seasonal wetting and drying conditions.

The Project would be subject to RCM GEO-1, which requires preparation of a site-specific geotechnical investigation to evaluate soil conditions, including expansion potential, and to provide design recommendations. In a worst-case scenario, untreated expansive soils could undergo shrink-swell cycles that result in differential settlement or heave, potentially causing cracking of foundations, slabs, or pavements, and damage to utilities. However, standard grading, foundation design, and site preparation in compliance with the CBC, geotechnical report recommendations, and local regulations would ensure that expansive soil conditions are properly addressed. Expansive soil impacts would be less than significant, and no project-specific mitigations are required.

- e) *Would the project 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?*

No Impact. The proposed Project does not involve development or use of septic tanks or alternative waste water disposal systems. The Project will provide connections to the existing sewer collection system in the City of Santa Ana. No septic tank impact would occur and no mitigation is required.

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

Less than Significant with Mitigation Incorporated. The following discussion summarizes the analysis on paleontological resources contained in the Cultural Report. Chambers Group requested a paleontological records search from the Natural History Museum of Los Angeles County (NHMLA) on May 30, 2025. This information was requested with the intent of providing further context related to

the paleontological sensitivity of the area based on known fossil locations identified within the Project site and the requested half-mile search radius. The paleontological records provide insight into what associated geological formations are most likely to contain fossils as well as the associated depths and placement of the known fossil locals relative to the geological formations in the area.

The records search results, received on June 8, 2025, identified no fossil localities directly within the Project site. However, the results identified fossil localities nearby from the same sedimentary deposits that may occur in the Project site, either at the surface or at depth (Appendix C, Cultural Report). As such, there is potential to encounter potentially significant paleontological resources within these fossil bearing sedimentary deposits underlying the Project site, depending on the specific depth and locations of these sedimentary deposits and the related Project construction plans.

In the event that paleontological resources are inadvertently discovered during Project construction activities, Mitigation Measure (MM) PAL-1 requires that a County-approved Qualified Project Paleontologist be retained during ground-disturbing activities and that a paleontological mitigation plan be developed and implemented to guide monitoring, recovery, and curation of any resources encountered. MM PAL-1 also requires that the Project Paleontologist prepare a final report summarizing monitoring efforts and any paleontological resources discovered, with additional documentation submitted as needed. With implementation of MM PAL-1, paleontological impacts would be less than significant.

MM PAL-1 Prior to the issuance of a grading permit, the County shall be required to obtain the services of a Qualified Project Paleontologist to remain on call for the duration of the proposed ground-disturbing construction activity. The paleontologist selected must be approved by the County. Upon approval or request by the County, a Paleontological Mitigation Plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the Project and submitted to the County for review and approval. The development and implementation of the PMP shall include consultations with the County's Engineering Geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the County. If the County accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project-related ground-disturbing activities, as well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered. At the completion of all ground-disturbing activities, the Project Paleontologist shall prepare a final paleontological mitigation report summarizing any monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any. As well as providing follow-up reports and records for specific discoveries, as necessary.

5.8 GREENHOUSE GAS EMISSIONS

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

5.8.1 Impact Analysis

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

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report (Appendix A).

The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed Project is anticipated to generate GHG emissions from mobile sources, area sources, energy usage, waste disposal, water usage, and construction equipment. The Project's GHG emissions have been calculated with the CalEEMod (version 2022.1) model based on the construction and operational parameters detailed in Section 8.1 of the Air Report. A summary of the results is shown in the table below and the CalEEMod model run is provided in Appendix A of the Air Report.

Table 8. Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources ¹	192	0.01	0.01	195
Area Sources ²	1.5	<0.01	<0.01	1.5
Energy Usage ³	260	0.02	<0.01	261
Water and Wastewater ⁴	12.0	0.27	0.01	20.0
Solid Waste ⁵	17.0	1.70	0.00	60.0
Refrigeration ⁶	--	--	--	0.02
Construction ⁷	17.0	<0.01	<0.01	17.1
Total GHG Emissions	499	2.00	0.03	555
SCAQMD Screening Threshold				3,000
Exceed Thresholds?				No

Notes:

¹ Mobile sources consist of GHG emissions from vehicles.

² Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of GHG emissions from electricity and natural gas usage.

⁴ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

⁵ Waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills.

⁶ Refrigeration includes GHG emissions from refrigerants in air conditioning units.

⁷ Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2022.1 (see Appendix A)

The data provided in the table above shows that the proposed Project would create 555 metric tons carbon dioxide equivalent (MTCO₂e) per year, which would be well below the SCAQMD's screening threshold of 3,000 MTCO₂e per year. Furthermore, the Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Hence, no net increase in operational energy usage is expected to occur. Therefore, a less than significant generation of GHG emissions would occur from development of the proposed Project and no mitigation is required.

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

Less than Significant Impact. The following discussion summarizes the analysis contained in the Air Report (Appendix A).

The proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. As detailed above, the applicable plan for the proposed Project is CARB's 2022 Scoping Plan.

The 2022 Scoping Plan identifies additional GHG reduction actions and strategies necessary to achieve the AB 1279 target of 85 percent below 1990 levels by 2045. These actions and strategies build upon

those identified in the first update to the Scoping Plan (2013) and in the second update to the Scoping Plan (2017). Although a number of these measures are currently established as statewide regulations, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Provided in the table below, Consistency with the 2022 Scoping Plan, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the proposed Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

Table 9. Consistency with the 2022 Scoping Plan

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
GHG Emissions Reductions Relative to the SB 32 Target 40% below 1990 levels by 2030.	No Conflict. The primary GHG emissions generated by the proposed Project would be from generation of electricity. SB 1020 requires that by end of 2035, 90 percent of electricity and by end of 2045 that 100 percent of electricity is generated from renewable and zero-carbon resources. In addition, the proposed Project will include a 10,000 SF solar PV canopy system that will assist in meeting this requirement. As such, the proposed Project would not conflict with this strategy.
Smart Growth / VMT VMT per capita reduced to 25% below 2019 levels by 2030, and 22% below 2019 levels by 2045.	No Conflict. As detailed in the VMT Screening Memo (Appendix G), the proposed Project meets both the City and County VMT screening criteria. As such, the proposed Project would not conflict with this strategy.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs) 100% of LDV sales are ZEV by 2035.	Not Applicable. Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2035. The proposed Project would not include any vehicle sales activities.
Truck ZEVs 100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	No Conflict. Executive Order (EO) N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2045. Any truck deliveries to the project site during either construction or operations would be operated and maintained by outside companies that would be required to meet the state truck regulations. As such, the proposed Project would not conflict with this strategy.
Aviation 10% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045.	Not Applicable. The proposed Project would not utilize any aviation fuel.

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Not Applicable. The proposed Project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The proposed Project would not impact any freight or passenger rail operations.
Oil and Gas Extraction	
Phase out oil and gas extraction operations by 2045.	Not Applicable. The proposed Project would not impact any oil and gas extraction activities.
Petroleum Refining	
CCS on majority of petroleum refining operations by 2030. Production reduced in line with petroleum demand.	Not Applicable. The proposed Project would not impact any petroleum refining activities.
Electricity Generation	
Electric sector GHG target of 38 MMTCO ₂ e in 2030 and 31 MMTCO ₂ e in 2045. Retail sales load coverage	No Conflict. SB 1020 requires that 100 percent of retail sales of electricity be generated by renewable or zero-carbon source of electricity by December 1, 2045. In addition, the proposed Project will include a 10,000 SF solar PV canopy system that will assist in meeting this requirement. As such, the proposed Project would not conflict with this strategy.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial).	Not Applicable. The proposed non-residential project would be constructed prior to 2029.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life.	Not Applicable. The proposed Project would not include any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life.	Not Applicable. The proposed Project would not include any existing commercial buildings.
Food Products	

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
7.5% of energy demand is electrified directly and/or indirectly by 2030; 75% by 2045.	Not Applicable. The proposed Project would not include any commercial food production activities.
Construction Equipment 25% of energy demand is electrified by 2030 and 75% electrified by 2045.	No Conflict. EO N-79-20 requires all off-road vehicles and equipment to transition to 100 percent zero-emission equipment, where feasible, by 2035. All construction equipment fleets utilized during construction of the proposed Project are required to be registered with CARB and meet CARB's current emission reductions regulations, which are anticipated to be updated to meet EO N-79-20 requirements. As such, the proposed Project would not conflict with this strategy.
Chemicals and Allied Products; Pulp and Paper Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	Not Applicable. The proposed Project would not include any pulp and paper production activities.
Stone, Clay, Glass, and Cement CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	Not Applicable. The proposed Project would not include any stone, clay, glass and cement production activities.
Other Industrial Manufacturing 0% energy demand electrified by 2030 and 50% by 2045.	Not Applicable. The proposed Project would be constructed prior to 2030.
Combined Heat and Power Facilities retire by 2040.	Not Applicable. The proposed Project would not include any existing combined heat and power facilities.
Agriculture Energy Use 25% energy demand is electrified by 2030 and 75% by 2045.	Not Applicable. The proposed Project would not include any commercial agriculture activities.
Low Carbon Fuels for Transportation Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed Project would not include any production of fuels for transportation.
Low Carbon Fuels for Buildings and Industry In 2030s, renewable natural gas (RNG) blended in pipeline. Renewable hydrogen blended in natural gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	Not Applicable. The proposed Project would not include any production of fuels for buildings and industry.
Non-combustion Methane Emissions	

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	Not Applicable. The proposed Project would not include the operation of any landfill or dairy.
High Global Warming Potential (GWP) Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating Hydrofluorocarbons (HFC) emissions.	Not Applicable. The proposed Project would not include the manufacturing of appliances that use low GWP refrigerants.
Compensate for Remaining Emissions	
Carbon Dioxide Removal (CDR) demonstration projects deployed by 2030. CDR scaled to compensate for remaining GHG emissions in 2045	Not Applicable. The proposed Project would not include any CDR demonstration projects

Source: CARB, 2022.

As shown above, the proposed Project would not conflict with any applicable proposed action or strategy in the 2022 CARB Scoping Plan. Therefore, the proposed Project would be consistent with the 2022 CARB Scoping Plan and potential GHG impacts would be less than significant. No mitigation is required.

5.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
(e)	For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

5.9.1 Impact Analysis

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

Less than Significant Impact. Construction activities for the proposed Project would involve the use of chemical substances such as solvents, paints, fuel for equipment, and other potentially hazardous materials. However, such activities would be relatively short-term. The transport, use and disposal of hazardous materials would be in small quantities and be temporary. While construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities. As the Project would not use a significant amount of hazardous materials during construction, it would not create a significant hazard to the public or the environment, and this impact would be less than significant.

During routine operations, the facility would handle common automotive maintenance materials, including motor oils, hydraulic fluids, cleaning solvents, and batteries. The proposed Fleet Facility would manage hazardous materials, including motor oil, fuels, solvents, coolants, lubricants, and

other automotive fluids, in accordance with applicable federal, state, and local environmental and occupational safety regulations. Hazardous materials are stored in designated, clearly labeled containers within secured areas equipped with appropriate secondary containment measures to minimize the potential for spills or releases. Facility personnel receive training on the proper handling, storage, and disposal of hazardous materials, and routine inspections are conducted to ensure compliance with established procedures and regulatory requirements. Used oils, fluids, filters, and other regulated wastes are managed in accordance with applicable hazardous waste regulations through licensed waste transporters and recycling or disposal facilities, as appropriate. Spill response equipment is maintained onsite, and established spill prevention and response procedures are implemented to promptly contain and mitigate accidental releases.

The facility would operate under the oversight of applicable regulatory agencies, including the California Division of Occupational Safety and Health (Cal/OSHA), the South Coast Air Quality Management District (South Coast AQMD), the Orange County Certified Unified Program Agency (CUPA), and other federal, state, and local agencies with jurisdiction. The County maintains required permits, plans, inspections, and reporting to ensure continued compliance with applicable environmental and safety. Compliance with existing regulations would result in less than significant impacts related to hazardous materials. No mitigation is required.

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

Less than Significant Impact. The primary incidents involving the routine handling and use of petroleum products, automotive fluids, and other hazardous materials at the Fleet Services Building could include minor drips, leaks, or spills during both construction and operational phases. Impacts from such incidents would be avoided by thoroughly cleaning up minor drips, leaks, or spills as soon as they occur, in compliance with all applicable regulations for proper handling of these materials. As discussed in Section 5.10, *Hydrology and Water Quality*, a site SWPPP would be developed and implemented as a compliance mechanism with the NPDES General Construction Permit to ensure quick response to minor drips, leaks, or spills.

The County would develop and implement a HMBP as required by the California Health and Safety Code and the Orange County Health Care Agency (OCHCA). The HMBP would be completed and approved prior to handling or storing reportable quantities of hazardous materials or waste, or installation of tanks and other oil-filled equipment. The HMBP would include an Emergency Response Plan to address potential spills or releases.

If the facility includes aboveground petroleum or fuel tanks exceeding 55 gallons, and with a total storage capacity of 1,320 gallons or more, a Spill Prevention, Control, and Countermeasure (SPCC) Plan would also be required under federal regulations (40 CFR 112) and California Aboveground Storage Tank regulations. In addition, the facility would be required to immediately notify the California Office of Emergency Services and OCHCA in the event of a spill of 42 gallons or more of petroleum. Therefore, impacts that would create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant and no mitigation is required.

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

Less than Significant Impact. The nearest sensitive receptor to the Project site is the John F. Kennedy Elementary School that is adjacent to the north side of the Project site. Specifically, the eastern school property line is immediately adjacent to the proposed access road off McFadden Avenue. The southern school property line is immediately adjacent to the Project site boundary and approximately 100 feet north of the proposed Fleet Service Standalone Building (see Figure 1). The southern portion of the school contains a field that is used by students periodically throughout the day. The Project site is also 0.15 miles east from Century High School and 0.15 miles west from Madison Elementary School. During construction of the proposed Fleet Facilities Building, hazardous materials such as fuels (e.g., diesel and gasoline), oils, lubricants, paints, adhesives, and cleaning solvents would be used and temporarily stored on-site. Construction equipment would also generate emissions, including diesel exhaust, which contains hazardous air pollutants. In addition, there is a potential for accidental spills or leaks of these materials during handling, fueling, or maintenance activities. However, construction-related hazardous materials would be used in relatively small quantities and managed in accordance with applicable federal, state, and local regulations, including proper storage, labeling, and spill prevention measures. Standard BMPs, such as secondary containment, prompt spill cleanup, and worker training, would further reduce the risk of accidental release.

During operations, the Fleet Facilities Building would handle hazardous materials such as motor oil, lubricants, cleaning solvents, batteries, and small quantities of fuels. However, these materials are generally stored in limited quantities and managed under strict regulatory frameworks, including the HMBP and OCHCA requirements. Refer to Impact Analysis 5.9.1 a) for additional analysis.

Compliance with regulations will ensure the proper containment, storage, and disposal procedures, and adherence to spill prevention and emergency response plans, the handling and use of these materials would not result in significant hazardous emissions or releases that could affect nearby schools. Therefore, potential impacts from hazardous emissions or materials within one-quarter mile of existing or proposed schools would be less than significant and no mitigation is required.

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

No Impact. According to the Department of Toxic Substances Control (DTSC) and State Water Resources Board (SWRCB), the Project is not located on a site which is included on a list of hazardous materials site (DTSC 2025; SWRCB 2025).

A Phase I Environmental Site Assessment (ESA) was prepared by Verdantas in support of the proposed Project. (Appendix D: Phase I ESA -, February 19, 2026)

Historically, from at least the late 1930s through the mid-1980s, the Project site was used as an orchard without structures, tanks, or other features observed onsite with the exception of an undeveloped road transecting the middle of the site. In 2022, the Project site was partially developed with the present-day asphalt-paved parking lot in the northeast portion of the Project site. Currently, the Project site is partially developed with an asphalt-paved parking lot in the northeast portion and asphalt-paved, gated drive aisles traversing the Project site from entrances on the north, via East McFadden Avenue, and on the east, via South Grand Avenue. The asphalt-paved parking lot is

currently used by the adjoining Orange County offices to the east and north of the Project site. The remaining portions of the Project site are undeveloped landscaped or lawn areas.

From at least the late 1930s through the early 1950s, the adjoining properties consisted primarily of orchards. Between the mid-1960s and 2020, the adjoining properties were redeveloped with their present-day commercial/industrial structures. The Southern Pacific railroad is located adjacent to the west of the Project site, operating from at least the late 1800s until present. Currently, the Project vicinity consists primarily of mixed commercial and residential properties. JFK Elementary School is located directly to the northwest on the Site. Orange County offices, providing various services, are located north, east, and south of the Site. One 12,000-gallon diesel Underground Storage Tank (UST) is located approximately 100 feet east of the southern portion of the Site. The UST is used by the adjacent Orange County Data Center and no records indicative of a release from this UST were identified as part of the Phase I ESA. No off-site properties with environmental concerns that could present a risk to the Project were identified.

The findings of the Phase I ESA concluded that there is no evidence of Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs), or business environmental risks in connection with the Project site. Therefore, no impact related to a hazardous materials site would occur during construction or operations of the proposed Project and no mitigation is required.

- e) *For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

Less than Significant Impact. The Project site is not within 2 miles of an airport. The nearest airport is John Wayne Airport, located 3.5 miles south of the Project site. According to the Land Use Plan for John Wayne Airport, the Project site is within the boundary of the notification area required by Federal Aviation Regulation (FAR) Part 77 for any construction or alteration of objects within 20,000 feet of an airport runway that exceeds 150 feet above ground level (Commission 2008). The proposed Project would consist of low-lying structures that would be well below the 150-foot height threshold for FAR notification requirements.

In addition, the Project site is outside of the John Wayne Airport Impact Zones, which means it is located beyond the areas identified by the airport as being subject to higher risks from aircraft operations (Commission 2008). Therefore, impacts related to airport safety hazards or excessive noise during construction and operations would be less than significant. No mitigation is required.

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

Less than Significant Impact. The Unified County of Orange and Orange County Operational Area Emergency Operation Plan describe the emergency organization and the process of preparing, responding to, and recovering from disasters (County 2019).

The Project would avoid obstructing public roads, access points, or designated emergency routes. Construction activities would follow standard traffic control and staging practices to maintain safe access for emergency vehicles and personnel. No road closures would be necessary under the proposed Project. Equipment staging would occur entirely within the Project site boundaries, as shown in Figure 2.

During operations, the facility would not block or impede any established emergency evacuation routes, fire lanes, or other access points critical to the implementation of local emergency response plans. Routine maintenance and material handling would be conducted on-site without creating hazards or obstructions that could interfere with emergency response. The two access roads off McFadden Ave and Grand Ave would comply with the OCFA and California Fire Code requirements, including adequate fire vehicle access, and would be utilized for emergency evacuation from the site.

As a result, the Project would not impair or physically interfere with adopted emergency response or evacuation plans, and potential impacts would be less than significant. No mitigation is required.

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

No Impact. The Project site is located in an urbanized area and there are no large, undeveloped areas and/or steep slopes on or near the site that may pose wildfire hazards. The Project site is not within, nor adjacent to, a Fire Hazard Severity Zone (FHSZ) of state or local responsibility (CALFire 2025). The Project would be required to adhere to the CBC and California Fire Code.

Furthermore, the existing Project site is dominated by flammable ruderal, non-native vegetation. Development of the Project would remove this vegetation and replace it with impervious surfaces, thereby reducing the site's overall fuel load and wildfire risk. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires during construction or operations. No wildland fire impacts would occur and no mitigation is required.

5.10 HYDROLOGY AND WATER QUALITY

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

5.10.1 Impact Analysis

- a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

Less than Significant Impact. A Hydrology and Hydraulics Report (Appendix E: Hydrology Report, December 2025), was prepared by Haley & Aldrich, Inc. in support of the proposed Project.

Construction

During construction, the proposed Project would disturb approximately 4.59 acres of soil. Construction activities associated with site grading, paving, and building development would have the potential to temporarily affect water quality through erosion, sediment transport, and accidental releases of fuels, oils, or other hazardous materials. Typical construction-related pollutants include sediment, nutrients, trash, oil and grease, and trace metals. Because construction of the proposed Project would disturb more than one acre, it would be required to obtain coverage under the State Water Resources Control Board Construction General Permit (Order 2022-0057-DWQ, as amended) pursuant to the Clean Water Act NPDES program (RCM HYD-1).

Compliance with the Construction General Permit would require preparation and implementation of a SWPPP that identifies and incorporates BMPs to control erosion, sedimentation, and the discharge of pollutants during construction (RCM HYD-1). BMPs would include, but are not limited to, soil stabilization measures, perimeter controls, good housekeeping practices, and spill prevention and response procedures. With implementation of these standard regulatory requirements, construction-related impacts on surface water quality would be temporary and less than significant.

Operation

The Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Operation of the proposed Project would introduce potential sources of pollutants associated with vehicle maintenance, fueling, and storage activities, including oil and grease, metals, nutrients, pathogens, pesticides, and trash. In addition, the Project would increase impervious surface area, which would increase runoff volumes if not properly managed. The Hydrology Report indicates that unmitigated peak flows could increase substantially under post-development conditions; however, the Project would incorporate stormwater controls to ensure that post-development discharge does not exceed existing conditions (RCM HYD-3).

To address both flow and water quality, the project would implement a project-specific WQMP in accordance with the Orange County Drainage Area Management Plan (DAMP) and the County's NPDES Municipal Separate Storm Sewer System (MS4) permit requirements (RCM HYD-2). The WQMP includes a combination of structural and non-structural BMPs, including:

- Low Impact Development (LID) BMPs such as bioretention areas, modular wetlands, vegetated swales, and landscaped treatment areas to capture and treat stormwater runoff;
- Underground detention facilities to control peak flows and prevent increases in downstream discharge rates;
- Treatment control BMPs (e.g., proprietary filtration or modular wetland units) where LID measures alone cannot fully treat runoff;
- Structural source controls such as covered storage areas, protected fueling and maintenance areas, and drainage controls to prevent contact between stormwater and pollutants; and
- Non-structural controls including employee training, spill prevention and response plans, hazardous materials management, routine inspection and maintenance, and compliance with applicable industrial stormwater permit requirements.

These measures are designed to treat runoff to the maximum extent practicable, reduce pollutant loading, and ensure compliance with applicable waste discharge requirements and water quality standards. In addition, runoff from the site would be conveyed through BMPs prior to discharge to the municipal storm drain system, which ultimately drains to the Newport Bay watershed

Potential impacts to groundwater quality could occur through infiltration of contaminated stormwater or leaks/spills of hazardous materials. Site soils are classified as Hydrologic Soil Groups B and C, indicating moderate to slow infiltration rates, and infiltration BMPs would be used selectively where feasible and appropriate (Appendix E). The WQMP requires that stormwater be treated prior to any infiltration through the use of LID BMPs such as bioretention systems, which provide filtration

and pollutant removal. In addition, hazardous materials handling, fueling, and maintenance activities would be conducted in controlled areas with appropriate containment, drainage controls, and compliance with federal, state, and local hazardous materials regulations. Structural BMPs (e.g., covered fueling areas, secondary containment, and routing of wash water to sanitary sewer or treatment systems) and non-structural BMPs (e.g., spill response plans and inspections) would further reduce the potential for contaminants to reach underlying soils or groundwater.

Compliance with existing regulations would result in less than significant water quality impacts and no mitigation is required.

Regulatory Compliance Measures:

RCM HYD-1 **Construction General Permit.** Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under the SWRCB National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of Orange (County) Public Works Department, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A SWPPP shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP should identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via the SMARTs.

RCM HYD-2 **MS4 Permit.** Prior to the issuance of grading or building permits, the Project Applicant shall submit a Final WQMP to the Orange County Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES *Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region*, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). The Final WQMP shall be prepared consistent with the requirements of the County of Orange Technical Guidance Document for Water Quality Management Plans (TGD) and the North Orange County Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The Orange County Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are

incorporated into the final project design, and shall implement, maintain and operate all such BMPs in a timely and reasonably diligent manner.

RCM HYD-3

Final Hydrology Report. Prior to issuance of a grading permit, the Project Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The Project Applicant shall provide the Final Hydrology Report to the Director of the Orange County Public Works Department, or their designee, for review and approval.

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

Less Than Significant Impact. The Project would add approximately 200,000 SF of impervious surface to the site. The Project does not propose groundwater extraction, dewatering, or recharge activities, and post-development runoff would be managed through storm drains and detention facilities.

The City's 2020 Urban Water Management Plan (UWMP) outlines current water demands, sources, and supply reliability to the City by forecasting water use based on climate, demographics, and land use changes within the City (MWDOC 2021). The City of Santa Ana is a retail water supplier that provides water to its residents and other customers using the imported potable water supply obtained from its regional wholesaler, Metropolitan Water District of Southern California (MET), local groundwater from the Orange County Groundwater Basin (OC Basin), and recycled water from the Orange County Water District (OCWD). The Municipal Water District of Orange County (MWDOC) UWMP, concluded that they can meet full-service demands of their member agencies through 2045 during normal years, single-dry years and multiple-dry years (MWDOC 2021).

Construction-related water use for the proposed Project would be typical of similar development projects and would be temporary in nature, occurring only during the construction period. Water demand would primarily support concrete mixing and curing, dust control to comply with air quality requirements, soil conditioning for grading and compaction, and limited equipment cleaning and worker sanitation. These activities represent standard construction practices and do not involve unusual or excessive water consumption relative to comparable projects. Construction water would be obtained from existing municipal supplies or temporary connections, and its use would cease upon completion of construction. As such, the short-term and intermittent nature of construction water demand would not result in a substantial or long-term impact on regional water supplies.

Operation of the proposed Project would require water for the daily needs of County faculty, washing vehicles and equipment cleaning, as needed, and landscaping irrigation. Based on the CalEEMod output contained in Appendix A, Project operations are estimated to require 8,273,265 gallons per year for indoor water use and 259,130 gallons per year for outdoor water use. The Project would utilize drought-tolerant landscaping to reduce irrigation water usage. Additionally, the Project would be required to comply with water efficiency standards in the California Building Energy Efficiency Standards and the California Green Building Standards Code. Although the Project would result in an incremental increase in water demand, it is anticipated that MWDOC would be able to sufficiently accommodate this. Therefore, the Project would not substantially affect groundwater supplies or interfere with sustainable groundwater management of the basin, and impacts are less than significant. No mitigation is required.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
 - i) *Result in substantial erosion or siltation on- or off-site;*
 - ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
 - iii) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff?*
 - iv) *Impede or redirect flood flows?*

i)-iv) Less than Significant Impact.

The Project site consists of two parcels totaling approximately 11.3 acres. The area is largely developed with paved surfaces, storage areas, and minor landscaping. Topography is generally level with slight grading typical of urban parcels, sloping from north to south. Stormwater runoff sheet flows toward the centerline concrete gutter within the Paved Apron and Alley Layout (PAAL) and is collected into municipal storm drains. No natural drainage channels are present.

The Project is located within the Newport Bay watershed, which drains to Upper Newport Bay and ultimately the Pacific Ocean. Regional topography slopes gently toward the southwest.

Construction

Construction of the proposed Project would temporarily disturb on-site soils and modify localized drainage conditions, which could increase the potential for erosion and sedimentation during rainfall events. However, the Project site is currently developed with predominantly paved surfaces and ruderal vegetation and does not contain natural drainage channels or streams that would be altered.

During construction, erosion and siltation could occur due to grading and soil disturbance. As required under the SWRCB Construction General Permit, a SWPPP would be prepared and implemented to control erosion, sediment transport, and pollutant discharges (RCM HYD-1). The SWPPP would include BMPs such as soil stabilization, sediment barriers, perimeter controls, and good housekeeping practices. With implementation of these measures, potential construction-related erosion and siltation impacts would be minimized and would be less than significant.

Construction activities would not substantially increase long-term runoff rates or alter regional drainage patterns because these effects are temporary and would cease upon completion of grading and site stabilization. In addition, construction would not impede or redirect flood flows because the site is not located within a natural drainage channel or floodway and is not within a Federal Emergency Management Agency (FEMA) designated special flood hazard area (Appendix E).

Operation

The proposed development will convert the parcels into a centralized fleet operations facility with two primary buildings, expanded access roads, and associated infrastructure. Impervious coverage will increase significantly, resulting in higher runoff potential.

The preliminary results of the Hydrology Report indicate that unmitigated post-development peak flows could exceed existing conditions, necessitating detention and BMPs to maintain compliance with MS4 stormwater requirements (RCM HYD-2). Prior to the issuance of any grading or building permits, the applicant shall submit to the County, for review and approval, a WQMP, in compliance with the Orange County MS4 Permit (RCM HYD-2). The Project is also subject to the water quality conditions set forth per City of Santa Ana Municipal Code (Part 1, Chapter 18, Article IV, Section 18-156), which requires that all new development and significant redevelopment projects comply with the requirements of the Orange County DAMP (RCM HYD-2). Construction activities would also comply with applicable NPDES Construction General Permit requirements, including implementation of erosion and sediment control BMPs (RCM HYD-1).

The proposed drainage system will be designed to convey the mitigated 100-year design flow without surcharge and maintain hydraulic grade lines below finished surface elevations (RCM HYD-3). Pipe sizing will account for material type, roughness coefficient, and minimum slope requirements to comply with Orange County standards.

As discussed in the Hydrology Report, the proposed Project design addresses this by incorporating the following:

- An internal storm drain network;
- Underground detention facilities; and
- Water quality best management practices (BMPs; e.g., modular wetlands or bioretention)

Under post-development conditions, an internal storm drain network will collect roof and pavement runoff and route it through proposed water quality BMPs and underground detention before discharge to the existing public storm drain system along Grand Avenue. Post-development peak discharges at the connection to the public storm drain will be mitigated so they do not exceed existing conditions. These measures are intended to support compliance with the Orange County Hydrology Manual (Appendix E).

The Project site is not within a FEMA-mapped special flood hazard area (Appendix E). No flood control channels or floodplains would be altered, and flood flows would not be impeded or redirected.

Based on the existing site conditions, results of the Hydrology Report, and incorporation of project design features (internal storm drain network, underground detention facilities, and water quality BMPs), and regulatory requirements (RCM HYD-1 through HYD-3), the Project would not substantially alter existing drainage patterns or result in erosion, flooding, exceedance of stormwater system capacity, or impediment of flood flows. The proposed internal drainage system, underground detention, and water quality BMPs would mitigate post-development runoff to levels that do not exceed existing conditions and ensure compliance with the Orange County

MS4 Permit, DAMP, and applicable County and City standards. Accordingly, impacts related to drainage patterns and surface runoff would be less than significant and no mitigation is required.

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

Less than Significant Impact. The Project site is not located within a FEMA-mapped special flood hazard area (Appendix E). The site is situated more than nine miles inland from the Pacific Ocean, and there are no large bodies of water, reservoirs, or dams in the vicinity that could result in a seiche. The nearest body of water is a 2.52-acre pond located 2.30 miles south of the Project site (USFWS 2026). Given these conditions, the risk of flooding, tsunami, or seiche-induced inundation is minimal. Therefore, impacts related to flood hazards, tsunamis, seiches, and associated pollutant release would be less than significant and no mitigation is required.

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

Less than Significant Impact. The Project site is located within the Coastal Plain of Orange County Groundwater Basin, which is designated as a medium priority basin under the Sustainable Groundwater Management Act (DWR 2025). In 2019, the DWR approved OCWD's Alternative Plan, which demonstrated how the Coastal Plain of Orange County Groundwater Basin operated within its sustainable yield over a period of at least 10 years and is managed responsibly (DWR 2019). The Project does not propose groundwater extraction, recharge, or other activities that would affect basin sustainability.

Construction

During construction activities, excavated soil would be exposed, increasing the potential for soil erosion and sedimentation compared to existing conditions. Additionally, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste could be spilled or leaked and transported via stormwater runoff into receiving waters.

To address these risks, the Project would be required to comply with the NPDES Construction General Permit, as specified in RCM HYD-1, which requires preparation of a SWPPP and implementation of construction BMPs to control stormwater runoff and pollutant discharges.

Stormwater infiltration during construction is not expected to adversely affect groundwater quality because pollutants in stormwater are generally reduced through natural soil filtration processes as water infiltrates.

With compliance with applicable NPDES requirements and implementation of construction BMPs (RCM HYD-1), construction-related impacts to water quality and groundwater would be less than significant.

Operation

The Project site is located within the Coastal Plain of Orange County Groundwater Basin and within the jurisdiction of the Santa Ana RWQCB, which enforces the Basin Plan establishing water quality objectives and beneficial uses.

During operation, primary pollutants of concern include suspended solids, nutrients, heavy metals, pathogens, pesticides, oil and grease, and trash/debris. To address these, a final WQMP would be prepared in compliance with the North Orange County MS4 Permit, as required by RCM HYD-2. The WQMP would incorporate:

- LID BMPs such as bioretention areas, modular wetlands, vegetated swales, and landscaped treatment areas to capture and treat stormwater runoff;
- Underground detention facilities to control peak flows and prevent increases in downstream discharge rates;
- Treatment control BMPs (e.g., proprietary filtration or modular wetland units) where LID measures alone cannot fully treat runoff;
- Structural source controls such as covered storage areas, protected fueling and maintenance areas, and drainage controls to prevent contact between stormwater and pollutants; and
- Non-structural controls including employee training, spill prevention and response plans, hazardous materials management, routine inspection and maintenance, and compliance with applicable industrial stormwater permit requirements.

These measures would treat stormwater runoff and reduce pollutant discharges.

The Project would not require groundwater extraction during operation, as existing water infrastructure would serve the site. Additionally, operational BMPs would treat stormwater prior to any potential groundwater recharge.

The Project would comply with all applicable water quality control plans, including the Santa Ana RWQCB Basin Plan, the Orange County MS4 Permit, and the Orange County DAMP (RCM HYD-1, HYD-2, and HYD-3). Post-construction runoff would be managed through an internal storm drain network, underground detention facilities, and water quality BMPs implemented via a County-approved WQMP.

Because the Project would not extract or inject groundwater, and runoff is treated and conveyed in compliance with local and regional water quality requirements, it would not conflict with or obstruct implementation of any applicable water quality control or sustainable groundwater management plans. Impacts are therefore considered less than significant and no mitigation is required.

5.11 LAND USE AND PLANNING

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

5.11.1 Impact Analysis

a) Would the project physically divide an established community?

No Impact. The Project's proposed use as a fleet services facility would be consistent with the commercial and industrial uses on the project site and the surrounding development. The western perimeter of the Project site is bounded by train tracks and a fence, with residential properties located immediately beyond the tracks. The Project would maintain existing circulation patterns and would not obstruct access to any surrounding neighborhoods, community facilities, or public services, ensuring that the local community remains connected. Therefore, the Project would not physically divide the existing established community, as it does not create any new barrier between the residential neighborhoods and surrounding areas. Impacts related to dividing an established community would not occur and no mitigation is required.

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

No Impact. The Project site is zoned as M1 and has a General Plan land use designation as IND. Section 41-472 of the Santa Ana Zoning Ordinance permits automotive repair and service uses, thus the proposed Fleet Services Facility is consistent with local zoning requirements. Additionally, the Project is owned and operated by the County of Orange, and the Project will be constructed and permitted according to the County requirements and CBC. No entitlements are required from the City, and the proposed Project would not result in a conflict with an adopted plan, policy, or regulation intended to protect the environment. Furthermore, the Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Accordingly, no impact related to land use conflicts would occur and no mitigation is required.

5.12 MINERAL RESOURCES

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

5.12.1 Impact Analysis

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b) *Would the project 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?*

a) & b) No Impact. The California Geological Survey designates Mineral Resource Zones (MRZs) according to the presence of, or potential for underlying mineral resources. As stated in the County General Plan Resources Element, mineral resource areas in the County are primarily located in portions of the Santa Ana River, Santiago Creek, San Juan Creek, and Arroyo Trabuco, none of which include the Project site (General Plan, County 2025). There are no mining activities or mineral extraction uses near the Project site. Thus, the Project would not result in the loss of availability of locally important mineral resources.

There are no past or ongoing oil or gas drilling activities on or near the Project site. Review of the California Geologic Energy Management Division's (CalGEM) Well Finder shows no oil or gas wells are located on the Project site or within the vicinity (DOC 2025). Therefore, development of the site would not result in the loss of regional mineral resources. No impact related to the loss of mineral resources would occur and no mitigation is required.

5.13 NOISE

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

5.13.1 Impact Analysis

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less than Significant Impact. A Noise Impact Analysis (Appendix F: Noise Analysis, November 12, 2025) was prepared by Vista Environmental in support of the proposed Project.

This section summarizes the Noise Impact Analysis's discussion of the Project's construction and long-term operational noise impacts.

Construction-Related Noise

The construction activities for the proposed Project are anticipated to include site preparation and grading of the Project site, building construction of the Fleet Services Building, Facilities Operations Building, and solar panel canopy, paving of the on-site roads, disposal lot, and parking areas, and application of architectural coatings. Noise impacts from construction activities associated with the proposed Project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Section 18-314(e) of the City's Municipal Code exempts construction noise that occurs between 7:00 a.m. and 8:00 p.m. on weekdays from the City's noise standards. Section 4-6-7(e) of the County's Municipal Code exempts construction noise that occurs between 7:00 a.m. and 8:00 p.m. on weekdays from the County's noise standards. Since neither Municipal Code provides any limits to the noise levels that may be created from construction activities that occur during the allowable times for construction, the Federal Transit Authority (FTA) construction noise thresholds, contained in Table A of the Noise Impact Analysis, have been utilized that limit noise impacts to 80 dBA Leq during the daytime when construction noise is exempt.

Construction noise levels to the nearby sensitive receptors have been calculated through use of the Roadway Construction Noise Model (RCNM) and the parameters and assumptions are detailed in Section 6.1 of the Noise Impact Analysis. Construction noise levels to the nearby sensitive receptors, including JFK Elementary School and multifamily homes, are shown in the table below and the RCNM printouts are provided in Appendix C of the Noise Impact Analysis.

PDF-1 has been provided that would require the installation of a minimum 12-foot-high and approximately 1,200-foot-long concrete masonry unit (CMU) wall at the location of the New Wall as shown above in Figure 2 – Site Plan, that would cover the entire length of the south side of JFK Elementary School and east side of the adjacent homes. .

California Department of Transportation (Caltrans) research has found that sound walls provide 5 dB of noise shielding when the wall reaches the height of line of sight between source and receiver (approximately 10 feet high) and then an additional 0.9 dBA of noise shielding for each foot above the line of sight (Appendix F). As such, the proposed 12-foot-high permanent noise barrier (see PDF-1) would provide approximately 6.8 dBA of noise reduction, which was entered into the RCNM model. The RCNM printouts are provided in Appendix D of the Noise Impact Analysis.

As shown on Table 10: Construction Noise Levels at the Nearby Sensitive Receptors, with implementation of the permanent sound wall required by PDF-1, the construction-related noise levels at the nearest sensitive receptors (JFK Elementary School and multifamily homes) would be below the FTA construction noise standard of 80 dBA. Therefore, with implementation of PDF-1 and through adherence to allowable construction times provided in the City and County Municipal Codes, the proposed Project's construction-related noise would be reduced to less than significant.

Table 10. Construction Noise Levels at the Nearby Sensitive Receptors

Construction Phase	Construction Noise Level (dBA Leq) at:		
	South Side of JFK Elementary School ¹	Multi-Family Homes to West ²	East Side of JFK Elementary School ³
Site Preparation	75	78	79
Grading	75	78	79
Building Construction	73	77	--
Paving	72	75	76
Painting	70	72	--
FTA Construction Noise Threshold⁴	80	80	80
Exceed Thresholds?	No	No	No

Notes:

¹ The south side of JFK Elementary School was analyzed at 30 feet from property line to the center of the southern solar canopy.

² The multi-family homes to the west were analyzed at 55 feet from property line to homes.

³ The east side of JFK Elementary School that is adjacent to the access road was analyzed at 15 feet from property line to the center of the community garden area. No Building Construction or Painting would occur at the access road improvement area.

⁴ The FTA Construction noise thresholds are detailed above in **Error! Reference source not found.**

Source: RCNM, Federal Highway Administration, 2006

Operational Noise

The proposed Project consists of the operation of the new fleet services facility. Potential noise impacts associated with the operations of the proposed Project would be generated from the vehicular traffic on the nearby roadways and from on-site noise sources that may create noise levels in excess of City and County standards at the nearby receptors. The noise impacts to the nearby receptors from roadway noise and from the on-site noise sources have been analyzed separately below.

Roadway Vehicular Noise Impact to Nearby Sensitive Receptors

Vehicle noise is a combination of the noise produced by the engine, exhaust and tires. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The proposed Project does not propose any uses that would require a substantial number of truck trips and the proposed Project would not alter the speed limit on any existing roadway so the proposed Project's potential off-site noise impacts have been focused on the noise impacts associated with the change of volume of traffic that would occur with development of the proposed Project.

The *Santa Ana General Plan Update Draft Program Environmental Impact Report* (Santa Ana DPEIR), prepared by Placeworks, August 2020, utilizes the following thresholds of significance to assess traffic noise impacts at sensitive receptor locations:

- Greater than 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher;
- Greater than 3 dBA increase for ambient noise environments of 60 – 64 dBA CNEL; and
- Greater than 5 dBA increase for ambient noise environments of less than 60 dBA CNEL.

The proposed Project consists of the consolidation of two existing facilities that are located within two miles of the project site into the proposed facility. As discussed in the Air Report, according to OCPW staff, the new fleet services facility will generate approximately 150 daily vehicle trips (in and out) or a total of 300 one-way daily trips that include both vehicles to be serviced and loaner vehicles.

In addition, approximately 50 employees would work at the proposed facility. Based on each employee driving from home to work and back (2 trips) and from work to lunch and back (2 trips), the 50 employees would generate up to 200 daily trips during each workday. Therefore, it is anticipated that operation of the Proposed Project would generate an average of 500 daily trips, Monday through Friday (Appendix A).. The Santa Ana DPEIR shows that McFadden Avenue currently has 20,997 average daily trips (ADT) and Grand Avenue currently has 36,678 ADT. Therefore, the Project would result in a maximum of 2.4 percent increase in ADT on McFadden Avenue and a 1.4 percent increase in ADT on Grand Avenue.

In order for project-generated vehicular traffic to increase the noise level by 1.5 dB, the roadway traffic would have to increase by 50 percent, and to increase the noise level by 3 dB, the roadway traffic would have to double (Appendix F).

Since the proposed Project would only result in a maximum of 2.4 percent increase on McFadden Avenue and a 1.4 percent increase on Grand Avenue, when compared to existing conditions, the Project-related roadway noise increase is anticipated to be negligible and well below the most stringent 1.5 dBA road noise threshold. Operational roadway noise impacts would be less than significant.

On-site Noise Impacts to Nearby Sensitive Receptors

Section 18-312 of the City's Municipal Code and Section 4-6-5 of the County's Municipal Code limits the noise levels at the nearby homes to 55 dBA Leq or 75 dBA Lmax between 7:00 a.m. and 10:00 p.m. and 50 dBA Leq or 70 dBA Lmax between 10:00 p.m. and 7:00 a.m. Section 18-315 of the City's Municipal Code and Section 4-6-8 of the County's Municipal Code specify that the noise standard for schools is the same as the residential noise standard.

The nearest sensitive receptor to the Project site is the JFK School that is adjacent to the north side of the Project site. There are also multi-family homes that are as near as 55 feet west of the Project site. Table 11: Operational Noise Levels at the Nearby Sensitive Receptors Prior to Mitigation below shows the calculated operational noise levels at the nearby sensitive receptors, and the noise calculation printouts are provided in Appendix D of the Noise Impact Analysis. The calculated noise levels account for the noise reduction provided by the minimum 12-foot-high CMU wall required by PDF-1 and the assumption that the Project will not be operational during the City's nighttime noise ordinance hours (between 10:00 p.m. and 7:00 a.m.).

PDF-1 has been provided that would require the installation of a minimum 12-foot-high and approximately 1,200-foot-long concrete masonry unit (CMU) wall at the location of the New Wall as shown above in Figure 2 – Site Plan, that would cover the entire length of the south side of JFK Elementary School and east side of the adjacent homes.

Table 11. Operational Noise Levels at the Nearby Sensitive Receptors

Noise Source	Calculated Noise Levels at:			
	School to North		Multi-Family Homes to West	
	Average Noise (dBA Leq)	Max Noise (dBA Lmax)	Average Day (dBA Leq)	Max Noise (dBA Lmax)
Service Bays	36.1	56.5	36.8	57.2
Siren in Service Bay	37.9	64.5	38.9	65.5

Noise Source	Calculated Noise Levels at:			
	School to North		Multi-Family Homes to West	
	Average Noise (dBA Leq)	Max Noise (dBA Lmax)	Average Day (dBA Leq)	Max Noise (dBA Lmax)
Bus Bays	42.1	53.4	38.1	49.4
Compressor at Service Bays	37.6	56.8	37.9	57.1
Body Shop	43.1	53.6	48.2	58.7
Compressor at Body Shop	37.9	45.6	42.7	50.4
Metal Fabrication Shop	41.5	62.1	44.0	64.7
Rooftop Mechanical Equipment	36.1	56.6	38.6	59.1
Max or Combined Noise Level¹	48.9	64.5	51.5	65.5
City and County Noise Standards² (Day)³	55	75	55	75
Exceed City and County Noise Standards (Day)?	No	No	No	No

Notes:¹ The calculated noise levels include noise reduction provided by the proposed 12-foot high cmu wall (see Project Design Feature 1)

² The City noise standards were obtained from Section 18.312 of the Municipal Code, and the County noise standards were obtained from Section 4-6-5 of the Municipal Code.

³ The City and County nighttime noise standards are excluded because the Project will not be operational during nighttime hours (between 10:00 p.m. and 7:00 a.m.)

Table 11 above shows the calculated operational noise levels at the nearby sensitive receptors with the noise reduction provided by the minimum 12-foot-high CMU wall and closure of the facility during nighttime hours (between 10:00 p.m. and 7:00 a.m.). With implementation of the CMU sound wall required in PDF-1, the operation-related noise levels at JFK Elementary School and at the multi-family homes would be below the City and County noise standards. Therefore, the proposed Project's operations-related noise would be less than significant.

b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less than Significant Impact. This section summarizes the Noise Impact Analysis discussion of the Project's construction and long-term operational noise impacts (Appendix F).

Construction-Related Vibration Impacts

The construction activities for the proposed Project are anticipated to include site preparation and grading of the Project site, building construction of the Fleet Services Building, Facilities Operations Building, and solar panel canopy, paving of the on-site roads, disposal lot, and parking areas, and application of architectural coatings. The nearest off-site structure where people may sit, which makes them much more susceptible to vibration, would be the school structure located as near as 30 feet from the proposed access road to McFadden Avenue improvements that would add approximately 50,000 SF of paved roadway adjacent to the east side of JFK Elementary School.

Since neither the City or County General Plans or Municipal Codes provide any vibration standards for construction activities, Caltrans guidance (detailed in Section 4.2 of the Noise Impact analysis) has been utilized, which defines the threshold of perception from transient sources at 0.25 inch per second peak particle velocity (PPV).

The primary source of vibration during construction would be from the operation of a vibratory roller. A vibratory roller would create a vibration level of 0.21 inch per second PPV at 25 feet. Based on

typical propagation rates, the vibration level at the nearest off-site structure (30 feet away) would be 0.17 inch per second PPV. The vibration level at the nearest off-site structures would be below the 0.25 inch per second PPV threshold detailed above. Impacts would be less than significant.

Operations-Related Vibration Impacts

The proposed Project would consist of the on-going operation of the new fleet services facility. The on-going operation of the proposed Project would not include the operation of any known vibration sources. Therefore, a less than significant vibration impact is anticipated from the operation of the proposed Project and no mitigation is required.

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

Less than Significant Impact. The Project site is not within 2 miles of an airport. The nearest airport is John Wayne Airport, located 3.5 miles south of the Project site. According to the Land Use Plan for John Wayne Airport, the Project site is within the boundary of the notification area required by FAR Part 77 for any construction or alteration of objects within 20,000 feet of an airport runway that exceeds certain height limits (Commission 2008). The proposed Project would comply with this requirement if it exceeds specified heights.

In addition, the Project site is outside of the John Wayne Airport Impact Zones, which means it is located beyond the areas identified by the airport as being subject to higher risks from aircraft operations (Commission 2008). Therefore, noise impacts towards people residing or working in the Project area would be less than significant and no mitigation is required.

5.14 POPULATION AND HOUSING

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

5.14.1 Impact Analysis

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

No Impact. During construction and operation, the proposed Project would aim to employ workers from the existing local population to minimize or avoid any unplanned substantial population growth. In addition, County employees currently working at the existing OC Fleet Services facilities at 445 Civic

Center West and 1102 East Fruit Street would be relocated to the Project site. Because the existing and proposed relocation of the OC Fleet Services facilities are located within Santa Ana, the relocation of work sites would not introduce new workers to the City of Santa Ana or result in population growth in the Project area.

While some County personnel from outside Santa Ana may occasionally visit the proposed Fleet Services Facility to service County vehicles, these visits would be temporary and would not involve new housing or permanent relocation. Furthermore, the Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Therefore, the proposed Project would not induce substantial unplanned population growth in the area. No impact related to unplanned population growth would occur and no mitigation is required.

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

No Impact. As discussed above in Section 5.14.1 Threshold a), the proposed Project involves the relocation and consolidation of existing OC Fleet Services facilities to the new vacant site that is surrounded by institutional/commercial/industrial buildings. The Project site does not contain any residential units, and no homes or housing would be removed or displaced as part of the Project. Therefore, the Project would not displace substantial numbers of existing people or require the construction of replacement housing elsewhere. No impact related to displacement of people or housing would occur and no mitigation is required.

5.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of 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?	☐	☐	☒	☐
	ii) Police Protection?	☐	☐	☒	☐
	iii) Schools?	☐	☐	☐	☒
	iv) Parks?	☐	☐	☐	☒
	v) Other public facilities?	☐	☐	☐	☒

5.15.1 Impact Analysis

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

Less than Significant Impact. The proposed Project would be served by OCFA Station #74, which is located 0.90 miles west and approximately 7-minute driving distance.

As previously discussed in Section 5.14.1 Threshold a), the Project construction and operations would aim to employ workers from the local population, thus would not result in an increase in the local residential population. Nevertheless, a minor increase in demand for fire services would potentially result from the increase in workforce in this area. Coordination with the local fire department would be required before any building occupancy to ensure worker safety measures are in place.

According to the City of Santa Ana General Plan, although fire incidents have increased from 2013 to 2018, OCFA continues to meet their performance standards for emergency calls in Santa Ana (City 2021). Furthermore, per the County General Plan, the OCFA shall review the Project site plans prior to their consideration, to ensure that adequate fire and paramedic facilities will be available or programmed for construction with determined funding sources (County 2025). Therefore, operational impacts related to the provision of new facilities as a result of increased demand for fire services would be less than significant and no mitigation is required.

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

Less than Significant Impact. The proposed Project would be served by the Santa Ana Police Department (SAPS) Substation located at 1780 McFadden Ave, Santa Ana, CA 92705. The Substation is located 0.60 miles east of the Project site and approximately 5-minute driving distance.

As previously discussed, the Project construction and operations would aim to employ workers from the local population, thus would not result in an increase in the local residential population. Nevertheless, a minor increase in demand for police services would potentially result from the increase in workforce in this area. The incremental demand of the Project for police protection services is not anticipated to increase SAPS response times to the Project site or the surrounding areas. In addition, the Project would provide security measures such as controlled access gates along both proposed access roads and a security camera system. Therefore, the Project would not result in significant impacts regarding police services and no mitigation is required.

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

No Impact. As previously discussed, the Project construction and operations would aim to employ workers from the local population in an effort to avoid or minimize an increase in the local residential population or student population. Furthermore, circulation and access at JFK Elementary School would remain unchanged with implementation of the proposed Project. No impact related to schools would occur and no mitigation is necessary.

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

No Impact. As previously discussed, the Project construction and operations would aim to employ workers from the local population in an effort to avoid or minimize an increase in the local residential population. The Project does not include a housing component that would induce direct population growth that would then generate demand for parks. Therefore, the Project would not increase demand for parks or require the construction or expansion of park facilities. No impacts to parks would occur and no mitigation is required.

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

No Impact. As previously discussed, the Project construction and operations would aim to employ workers from the local population in an effort to avoid or minimize an increase in the local residential population. The Project does not include a housing component that would induce direct population growth that would then generate demand for other public services. Instead, the Project would improve efficiency and reliability of County fleet operations by consolidating vehicle servicing into a modern facility. This enhancement would support the continued delivery of essential public services (e.g., law enforcement, emergency response, and community programs) that depend on County-owned vehicles, thereby providing a net public benefit. No impact to other public facilities would occur and no mitigation is required.

5.16 RECREATION

16.	RECREATION. Would the project:	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?	☐	☐	☐	☒

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☐	☒

5.16.1 Impact Analysis

- 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?*

No Impact. The Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Project construction and operations would aim to employ workers from the local population in an effort to avoid or minimize an increase in the local residential population. The Project does not include a housing component that would induce direct population growth that would then generate demand for parks or recreational facilities. Therefore, there are no construction or operational impacts related to the increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No recreational impact would occur and no mitigation is required.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Project construction and operations would aim to employ workers from the local population in an effort to avoid or minimize an increase in the local residential population. The Project does not include a housing component that would induce direct population growth that would then generate demand for recreational facilities. The Project does not include new recreational facilities or require the expansion of existing recreational facilities. Therefore, no recreational impacts would occur and no mitigation is required.

5.17 TRANSPORTATION

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

5.17.1 Impact Analysis

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

Less than Significant Impact.

Applicable programs include the Orange County Transportation Implementation Manual, City of Santa Ana General Plan Circulation Element, the Orange County Master Plan of Arterial Highways, the OCTA Long Range Transportation Plan (LRTP), and the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Although the Project may introduce vehicle trips to the Project area, it would not result in a net increase in trips given the Project would relocate and consolidate existing OC Fleet operations.

Access to the Project site would be provided via existing driveways from McFadden Avenue and South Grand Avenue, both of which are designated arterial roadways within the City's and County's circulation network. The Project would not require modifications to public roadway alignments, reduce roadway capacity, or interfere with planned roadway improvements identified in the City of Santa Ana General Plan Circulation Element or the Orange County Master Plan of Arterial Highways (City 2022a; County 2026a).

The Project would not conflict with adopted or planned transit facilities, as it does not remove or obstruct transit routes, stops, or rights-of-way identified in OCTA or SCAG planning documents. In addition, the Project would not eliminate or impede existing or planned bicycle or pedestrian facilities identified in the City of Santa Ana General Plan or related active transportation plans. Access to the site would be restricted to County staff, and no new public pedestrian or bicycle access would be required.

The Project is also consistent with the SCAG RTP/SCS, as it represents a consolidation of existing public facilities and supports efficient public services without inducing additional travel demand beyond regional assumptions.

Per the Orange County Transportation Implementation Manual, the proposed Project qualifies as a government-owned facility that is not used for revenue generation or commercial purposes and is therefore exempt from the County's Growth Management (GM) Element Traffic Level of Service (LOS) policies (County 2020a). Accordingly, the Project is not subject to GM Element traffic requirements, including applicable traffic analysis methodologies and minimum traffic report standards.

According to the Orange County Vehicle Miles Travelled (VMT) Screening Application, the proposed Project is within a High-Quality Transit Area (HQTa), meaning it is within walking distance of a major transit stop or high-frequency transit corridor. This location supports multimodal transportation options, including transit, walking, and bicycling, and is consistent with state and regional goals to reduce reliance on single-occupant vehicle travel (County 2026b).

The City of Santa Ana does not maintain vehicle LOS significance thresholds for evaluating transportation impacts and, consistent with SB 743, evaluates transportation impacts using VMT

rather than intersection or roadway LOS. As discussed below under Threshold b), the City of Santa Ana's VMT guidelines allow certain projects to be screened out of a detailed VMT analysis if they meet specific criteria, including being located within a Transit Priority Area (TPA), being located in a low-VMT Traffic Analysis Zone (TAZ), and being consistent with regional land use assumptions. The Proposed Project qualifies for screening because it consolidates existing fleet operations into a centralized facility that improves operational efficiency and reduces redundant vehicle trips. The Project is located within a TPA, is situated in a low-VMT generating TAZ (more than 15 percent below the Orange County average), is consistent with RTP/SCS land use assumptions, and is located outside areas where a full VMT analysis is required. Therefore, the Project meets the City's screening criteria and does not require a detailed VMT analysis. The Project would improve connectivity within the site through extensions of existing access roads, maintain compatibility with the surrounding circulation system, and avoid impacts to the City's planned transportation facilities. Thus, the Project would not conflict with the goals, policies, or implementation measures of the City of Santa Ana Mobility Element.

Therefore, the proposed Project would not conflict with any adopted program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, or pedestrian facilities; a less than significant impact would occur. No mitigation is required.

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

Less than Significant Impact. A VMT Screening Memorandum (VMT Memo) was prepared in support of the proposed Project (Appendix G: VMT Screening Memorandum, October 9, 2025). The following discussion summarizes the analysis contained in the VMT Memo.

County of Orange VMT Analysis

Thresholds

The County of Orange VMT assessment guidelines are specified in the Guidelines for Evaluating Vehicle Miles Traveled Under CEQA (County 2020b). Per the County's guidelines an initial VMT project screening is needed to determine if a full VMT analysis is required. Land development projects that have one or more of the following attributes may be presumed to create a less than significant impact on transportation and circulation:

- Project in HQTA: The Project is within 0.5 mile (mi) of a Transit Priority Area (TPA) or an HQTA, unless the project is inconsistent with the RTP/SCS, has a floor to area ratio less than 0.75, provides an excessive amount of parking, or reduces the number of affordable residential units.
- Neighborhood Retail Project: The project involves local-serving retail space of less than 50,000 SF.
- Affordable Housing Project: The project is 100 percent affordable-housing units.
- Low VMT Area Project: The Project is in low VMT areas per the most recent Orange County Traffic Analysis Model (OCTAM) version showing the proposed project is within a low VMT area.
- Small Project: A project generates 500 or fewer ADT.
- Public Facilities: The development of institutional/government and public service uses that support community health, safety or welfare are also screened from subsequent CEQA VMT analysis.

Analysis

Criteria: Low VMT Area Project

While the Low VMT Areas of the County of Orange Guidelines do not feature areas within the Santa Ana City limits, the City of Santa Ana Traffic Impact Study Guidelines (Figure 3 of the VMT Memo; City 2019) show that the Project is in low VMT area (15% below County Regional Average). As such, this criterion is met. The Project does not meet any other criteria. Given the Project meets at least one criterion, it is screened out from further VMT analysis under the County of Orange assessment guidelines.

Criteria: Public Facilities

The Project would be a public facility that promotes benefits to the local community by consolidating existing fleet operations into a centralized, more efficient facility that supports essential public services (e.g., maintenance of public works and service vehicles). This consolidation reduces redundant trips between multiple existing sites, streamline fleet operations, and improves response times for public services. In addition, the Project is located within a HQTAs (County 2026b) and in a low-VMT area, which supports employee access via transit and other non-auto modes. Collectively, these factors reduce reliance on personal vehicle travel and lower overall VMT, thereby directly supporting community mobility, air quality, and overall public welfare. This criterion is met.

City of Santa Ana VMT Analysis

Thresholds

The City of Santa Ana's VMT assessment guidelines are specified in Resolution 2019-049 Vehicle Miles Traveled Thresholds of Significance for Purposes of Analyzing Transportation Impacts Under the CEQA. Per the City's guidelines an initial VMT project screening is needed to determine if a full VMT analysis is required. The following criteria are used to determine if the project can be screened out from a VMT assessment:

- Projects which serve the local community and have the potential to reduce VMT, such as neighborhood K-12 schools and local-serving retail less than 50,000 SF. (Charter schools are excluded from this criteria).
- Projects that generate less than 110 net daily trips.
- Projects located within Transit Priority Areas (TPAs). Due to the many high quality transit routes in the City, much of the City is a transit priority area.
 - TPAs are defined as a ½ mile radius around an existing or planned major transit stop (e.g. Metrolink Station, Streetcar Station, etc.) or an existing stop along a high-quality transit corridor. The City guidelines provide a map of Santa Ana TPAs.
 - HQTAs are defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.
 - Projects that are in TPAs will also be required to complete a secondary screening step to verify the proposed Project's consistency with the assumptions from the RTP/SCS. This consistency can be a land use review (e.g. are the proposed land uses already included in the RTP/SCS) or can be reviewed from a VMT per service population (VMT/SP) perspective (e.g. does the resulting land use increase or decrease the VMT/SP in the Traffic Analysis Zone (TAZ) compared to the RTP/SCS assumptions).
- Projects located in a low-VMT generating TAZ. Low-VMT TAZs per Santa Ana's threshold of significance are any TAZs generating VMT 15 percent below the Orange County average. The City guidelines provide a map showing the VMT/SP in Santa Ana as compared to the Orange County average. These projects will require two additional secondary screening steps:

1. Verify that the proposed land use is consistent with the existing land use that is generating low VMT/SP. This will include a land use comparison (type, density, demographics, etc.).
2. Verify that the proposed land use is consistent with RTP/SCS assumptions or the project decreases VMT/SP compared to the RTP/SCS.

In addition, the City guidelines provide a map that shows areas in the City that cannot be screened out by being located in a TPA or low-VMT generating area and identify locations where VMT analysis would be required.

Analysis

Criteria: Projects which serve the local community and have the potential to reduce VMT

The Project promotes benefits to the local community by consolidating existing fleet operations into a centralized, more efficient facility that supports essential public services (e.g., maintenance of public works and service vehicles). This consolidation reduces redundant trips between multiple existing sites, streamline fleet operations, and improves response times for public services. In addition, the Project is located within a Transit Priority Area and in a low-VMT area, which supports employee access via transit and other non-auto modes. Collectively, these factors reduce reliance on personal vehicle travel and lower overall VMT, thereby directly supporting community mobility, air quality, and overall public welfare. This criterion is met.

Criteria: Projects located within TPAs

The proposed Project is located within a TPA. Figure 2 of the VMT memo shows that the Project site is located within half-mile around high-quality bus stops per the City's guidelines. The proposed Project is also consistent with the land use assumptions from the RTP/SCS per SCAG GIS Parcel Locator Database (Appendix G). As such, this criterion is met.

Criteria: Project located in a low-VMT generating TAZ

The proposed Project is in a low-VMT generating TAZ. Figure 3 of the VMT Memo shows that according to the VMT/SP map provided by the City guidelines, the Project site is located in a low-VMT TAZ per the City's threshold of significance (TAZ generating VMT 15% below the Orange County average). The proposed land use is also consistent with the existing land use and with RTP/SCS assumptions as noted earlier. As such, this criterion is met.

Criteria: Project located outside Santa Ana development areas that cannot be screened

The proposed Project is located outside the areas in Santa Ana that cannot be screened out by being located in a TPA or low-VMT generating. Figure 4 of the VMT Memo shows that the Project site is located outside of City areas where VMT analysis is required per the City's guidelines.

Based on the VMT screening analysis presented above, the proposed Project is presumed to have a less than significant transportation impact both per County and City Guidelines and no mitigation is required.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less than Significant Impact. The proposed Project would relocate and consolidate existing OC Fleet Services operations to a County-owned site within an established M1 area and adjacent to existing

County facilities. Fleet maintenance and operations are consistent with the industrial zoning. Therefore, the proposed Project does not introduce new or unusual land uses that would be incompatible with surrounding uses.

With respect to geometric design, the Project would extend existing access roads and driveways from McFadden Avenue and South Grand Avenue to serve the site. These improvements would be designed to match current engineering and safety standards and would primarily serve County staff only. No sharp curves, hazardous roadway alignments, or dangerous intersections are proposed. The internal circulation system is intended to improve vehicle movement, reduce conflicts, and enhance safety for fleet vehicles and employees. Therefore, impacts related to hazardous design features would be less than significant and no mitigation is required.

d) *Would the project result in inadequate emergency access?*

Less than Significant Impact. The Project would avoid obstructing public roads, access points, or designated emergency routes. Construction activities would follow standard traffic control and staging practices to maintain safe access for emergency vehicles and personnel. No road closures would be necessary under the proposed Project. Equipment staging would occur entirely within the Project site boundaries, as shown in Figure 2.

During operations, the facility would not block or impede any established emergency evacuation routes, fire lanes, or other access points critical to the implementation of local emergency response plans. Routine maintenance and material handling would be conducted on-site without creating hazards or obstructions that could interfere with emergency response. The two access roads off McFadden Ave and Grand Ave would comply with the OCFA and California Fire Code requirements, including adequate fire vehicle access, and would be utilized for emergency evacuation from the site.

As a result, the Project would not result in inadequate emergency access, and potential impacts would be less than significant. No mitigation is required.

5.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐

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

5.18.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*
- b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

a & b) Less than Significant with Mitigation Incorporated. Effective July 1, 2015, AB 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Public Resources Code (PRC) Section 21074 as 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 resource. Per PRC Section 21080.3.1, a tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed Projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual

agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

The NAHC is a state agency that maintains the Sacred Lands File (SLF), an official list of sites that are of cultural and religious importance to California Native American tribes. On May 30, 2025, Chambers Group requested that the NAHC conduct a search of its SLF to determine if sacred lands or resources important to Native Americans have been recorded in the Project site and surrounding half-mile radius. On June 26, 2025, Chambers Group received a response from the NAHC stating that their SLF search was positive.

In compliance with AB 52, the County mailed letters to local Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project and have previously requested to be notified of future projects proposed by the County. The letters, which were sent on August 21, 2025, via certified mail, provided each tribe with an opportunity to request consultation with the County regarding the proposed Project. The purpose of this effort was to provide Native American tribes with the opportunity for meaningful participation and to identify known tribal cultural resources on or near the Project site. The record of tribal consultation efforts is included as Appendix H to this IS/MND.

The following tribes received letters pursuant to AB 52:

- Gabrieleño Band of Mission Indians - Kizh Nation
- Juaneño Band of Mission Indians
- Gabrieleño Tongva San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians

As discussed in Section 5.5, Cultural Resources, of this IS/MND, no known cultural resources have been documented within the Project site boundaries or in the direct vicinity of the Project site based on archival research and field surveys. In addition, limited potential exists for the proposed Project to impact tribal cultural resources due to significant prior disturbance from past grading and development activities on the Project site and in the surrounding area. Regulatory Compliance Measure (RCM) CUL-1, identified in Section 5.5, Cultural Resources, sets forth procedures for handling inadvertent discoveries of human remains, including those determined to be Native American.

In addition, the proposed Project would incorporate SC CUL-1 and SC CUL-1, also identified in Section 5.5, Cultural Resources. SC CUL-1 requires the County to retain a Qualified Archaeologist to oversee the project, remain on call, and provide cultural resources sensitivity training to construction personnel on proper procedures and legal protections. SC CUL-2 requires that if cultural resources are discovered, work stops within 50 feet while the archaeologist evaluates the find and, if necessary, implements mitigation, monitoring, and reporting in compliance with regulations. Pursuant to SC CUL-2, any tribal cultural resources encountered during construction of the proposed Project would be evaluated in accordance with federal, State, and local guidelines to assess their significance and identify avoidance or other measures as appropriate.

To date, no other responses from the Native American community have been received as part of the AB 52 tribal consultation effort. As a result of the County's consultation efforts, no known tribal cultural resources have been identified within the Project site. As such, adherence to SC CUL-1, SC

CUL-2, SC TCR-1, and RCM CUL-1 would ensure that impacts related to the inadvertent discovery of Native American resources would be less than significant.

Standard Condition:

SC TCR-1 Unanticipated Discovery of Native American Resources. If unanticipated archaeological resources or Native American Resources or deposits are discovered during ground-disturbing activities, Orange County Public Works (OC Public Works) shall implement the following measures. All work shall halt within a 50-foot radius of the discovery. OC Public Works shall retain a qualified professional archaeologist with knowledge of Native American resources to assess the significance of the find. If the resources are Native American in origin, OC Public Works shall coordinate with the Tribe regarding evaluation, treatment, curation, and preservation of these resources. The archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment in consultation with OC Public Works. Work shall not continue within the no work radius until the archaeologist conducts sufficient research and evidence and data collection to establish that the resource is either (1) not cultural in origin; or (2) not potentially eligible for listing on the California Register of Historical Resources. If a potentially eligible resource is encountered, then the archaeologist and OC Public Works, as lead agency, in consultation with the Tribe, shall arrange for either: (1) avoidance of the resource, if possible; or (2) test excavations to evaluate eligibility, and if eligible, attempt to resolve adverse effects through implementation of appropriate mitigation, which may include, but shall not be limited to, salvage excavation, laboratory analysis and processing, research, curation, and preparation of a report summarizing the find. The assessment of eligibility shall be formally documented in writing as verification that the provisions in the California Environmental Quality Act for managing unanticipated discoveries and Public Resources Code Section 5024 have been met.

5.19 UTILITIES AND SERVICE SYSTEMS

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

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	☐	☐	☒	☐

5.19.1 Impact Analysis

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

Less than Significant Impact.

Water

The City's water distribution system consists of approximately 480 miles of transmission/distribution mains ranging from four to 30 inches in diameter. Across the City's 27-square-mile service area, water is supplied by the Irvine Ranch Water District (IRWD), Metropolitan Water District of Southern California (MWD), and Orange County Water District (OCWD) from groundwater, imported water, and recycled water (City 2021).

The proposed Project includes installation of on-site utilities, including sewer lines, water lines, and storm drain lines. These utility improvements would be constructed within the Project site and would connect to existing off-site utility systems already serving the surrounding developed area. The proposed Project would increase demand for water as compared to existing conditions, and on-site infrastructure is required for Project implementation. However, as discussed in Threshold b) below, impacts regarding water supply would be less than significant and no mitigation is required.

Wastewater

Wastewater services in the City are provided by Orange County Sanitation District (OCSD), which operates Reclamation Plan No. 1 and Treatment Plant No 2. Collectively these facilities treated an average of 184 million gallons per day (MGD) from 2024 to 2025 (OCSD 2025). According to the MWDOC 2020 UWMP, Reclamation Plant No. 1 has a maximum treatment capacity of 320 MGD and Treatment Plant No. 2 has a maximum treatment capacity of 312 MGD (MWDOC 2021). Given there is a remaining capacity of 448 MGD for wastewater treatment, it is reasonable to assume that the incremental increase in wastewater from the proposed Project would not have a significant impact on the OCSD wastewater treatment facilities. A less than significant wastewater impact would occur and no mitigation is required.

Stormwater Drainage

The proposed Project would install on-site stormwater infrastructure (e.g., drainage pipes and inlets) to collect and convey runoff to existing municipal storm drain facilities located adjacent to the Project site. Specifically, the Project would include:

- An internal storm drain network;

- Underground detention facilities; and
- Water quality BMPs (BMPs; e.g., modular wetlands or bioretention)

The outdoor yard shall be equipped with hose bibs and floor drains to facilitate cleaning and drainage. The yard surface shall be sloped toward the drains at the maximum grade permitted by applicable codes to ensure that water flows freely to the drains, preventing ponding. This design will allow the area to dry quickly after washing or rainfall without requiring manual sweeping or brooming of water into the drains. A less than significant stormwater drainage impact would occur and no mitigation is required.

Electric Power, Natural Gas, and Telecommunications

Electric power is provided to the City by SCE and natural gas is provided by the Southern California Gas Company (SoCalGas). Internet, phone, and satellite in the City are currently provided by a variety of private sources, including AT&T, Time Warner Cable, Spectrum, Windstream, and Mediacom.

According to the City's General Plan Update EIR, total electricity consumption in SCE's service area was 106,080 gigawatt-hour (GWh) in 2015 and is forecasted to increase to 118,803 GWh in 2027. Therefore, there is an anticipated increase of 12,723 GWh in electricity consumption between 2015 and 2027 in the entire SCE service area. The net forecasted increase of electricity consumption in the Santa Ana area is anticipated to be 256 GWh per year (City 2025).

As discussed in Section 5.6, *Energy*, the Project would consume a less than significant amount of electricity and natural gas, thus it is reasonable to assume that existing and planned utility infrastructure would be sufficient to meet the Project's demand without requiring the construction of new or expanded facilities that could cause significant environmental impacts. Likewise, the Project would not create substantial demand for telecommunications services beyond what is already provided in the City by existing providers. Therefore, the Project would not result in significant impacts related to electric power, natural gas, or telecommunications and no mitigation is required.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal dry and multiple dry years?*

Less than Significant Impact. The City's 2020 UWMP outlines current water demands, sources, and supply reliability to the City by forecasting water use based on climate, demographics, and land use changes within the City (MWDOC 2021). The MWDOC UWMP, concluded that they can meet full-service demands of their member agencies through 2045 during normal years, single-dry years and multiple-dry years (MWDOC 2021).

The proposed Project would require water for the daily needs of County faculty, washing vehicles and equipment cleaning as needed, and landscaping irrigation. Based on the CalEEMod output contained in Appendix A, Project operations are estimated to require 8,273,265 gallons per year for indoor water use and 259,130 gallons per year for outdoor water use. The Project would utilize drought-tolerant landscaping to reduce irrigation water usage. Additionally, the Project would be required to comply with water efficiency standards in the California Building Energy Efficiency Standards and the California Green Building Standards Code. Although the Project would result in an incremental increase in water demand, it is anticipated that MWDOC would be able to sufficiently accommodate this. Impact regarding sufficient water supplies available to serve the project and reasonably

foreseeable future development during normal dry and multiple dry years would be less than significant. No mitigation is required.

- c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less than Significant Impact. As previously discussed, the City's wastewater treatment facilities treated an average of 184 MGD from 2024 to 2025 (OCSD 2025). The City's Reclamation Plant No. 1 has a maximum treatment capacity of 320 MGD and Treatment Plant No. 2 has a maximum treatment capacity of 312 MGD (MWDOC 2021). Given there is a remaining capacity of 448 MGD for wastewater treatment, it is reasonable to assume that the incremental increase in wastewater from the proposed Project would not have a significant impact on the OCSD wastewater treatment facilities. A less than significant wastewater impact would occur and no mitigation is required.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. The County operates three landfills to serve the region: Olinda Alpha Landfill, Frank R. Bowerman Landfill, and Prima Deshecha Landfill. The Olinda Alpha Landfill has a remaining capacity of 17.5 million cubic yards and a maximum daily throughput of 8,000 tons per day (CalRecycle 2025a). The Frank R. Bowerman Landfill has a remaining capacity of 160 million cubic yards and a maximum daily throughput of 11,500 tons per day (CalRecycle 2025b). The Prima Deshecha Landfill has a remaining capacity of 128.8 million cubic yards and a maximum daily throughput of 4,000 tons per day (CalRecycle 2025c).

According to CalRecycle, an auto dealer and service station waste generation source would produce 0.9 pounds per 100 SF per day (CalRecycle 2006). Therefore, based on the footprint of the proposed buildings, the Project would generate approximately 591 pounds (0.30 tons) of solid waste per day. This comprises approximately 0.00013 percent of the combined daily throughputs of all County landfills. Further, operation of the Project would not represent a new source of waste because it involves the relocation and consolidation of existing OC Fleet Services operations rather than the introduction of new services or expanded capacity. Waste generation would remain comparable to existing conditions.

Construction of the proposed Project would be subject to Construction and Demolition (C&D) waste diversion requirements under CALGreen Code Section 5.408, which mandates 65% diversion of C&D debris. Construction waste drop-off locations include, but are not limited to, Madison Materials / Ware Disposal in Santa Ana, CR Transfer and Material Recovery Facility in Stanton, and other County-approved C&D recycling facilities in Orange County.

Given the relatively minimal amount of solid waste anticipated to be generated during Project operations and the Project's compliance with existing regulations governing construction waste, solid waste impacts would be less than significant and no mitigation is required.

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

Less than Significant Impact. The proposed Project would generate solid waste during both construction and operation. Construction waste would primarily consist of debris such as wood,

metal, concrete, and packaging materials. These materials would be disposed of or recycled in compliance with CALGreen Code Section 5.408, as previously discussed.

During operation, solid waste generated by the proposed Project would be collected by a franchise hauler and disposed of at the County's active landfills (Olinda Alpha, Frank R. Bowerman, and Prima Deshecha). As previously discussed, the Project would generate a nominal amount of waste compared to the large permitted daily throughput of the three active County landfills.

The Project would be required to comply with all applicable federal, state, and local statutes and regulations related to solid waste, including AB 939 (Integrated Waste Management Act), AB 341 (Mandatory Commercial Recycling), AB 1826 (Mandatory Commercial Organics Recycling), SB 1383 (Short-Lived Climate Pollutants), and the Orange County Integrated Waste Management Department's (OC Waste & Recycling) policies and programs for waste diversion and recycling. Compliance with these programs ensures that solid waste generated by the Project would be managed and reduced consistently with applicable regulations. Therefore, the Project would not result in a significant impact related to solid waste management or compliance with applicable statutes. No mitigation is required.

5.20 WILDFIRE

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

5.20.1 Impact Analysis

a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

Less than Significant Impact. The Unified County of Orange and Orange County Operational Area Emergency Operation Plan describe the emergency organization and the process of preparing, responding to, and recovering from disasters (County 2019).

Neither the County GP Safety Element nor the City of Santa Ana GP Safety Element provide an evacuation route as part of the Project area. The Project would avoid obstructing public roads, access points, or designated emergency routes. Construction activities would follow standard traffic control

and staging practices to maintain safe access for emergency vehicles and personnel. No road closures would be necessary under the proposed Project. Equipment staging would occur entirely within the Project site boundaries, as shown in Figure 2.

During operations, the facility would not block or impede any established emergency evacuation routes, fire lanes, or other access points critical to the implementation of local emergency response plans. Routine maintenance and material handling would be conducted on-site without creating hazards or obstructions that could interfere with emergency response. The two access roads off McFadden Ave and Grand Ave would comply with the OCFA and California Fire Code requirements, including adequate fire vehicle access, and would be utilized for emergency evacuation from the site.

As a result, the Project would not impair or physically interfere with adopted emergency response or evacuation plans, and potential impacts would be less than significant and no mitigation is required.

- b) *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

No Impact. The Project site is located in an urbanized area and there are no large, undeveloped areas and/or steep slopes on or near the site that may pose wildfire hazards. The Project site is not within, nor adjacent to, a Fire Hazard Severity Zone (FHSZ) of State or local responsibility (CALFire 2025). The Project would be required to adhere to the CBC and California Fire Code.

Furthermore, the existing Project site is dominated by flammable ruderal, non-native vegetation. Development of the Project would remove this vegetation and replace it with impervious surfaces, thereby reducing the site's overall fuel load and wildfire risk. Therefore, the Project would not expose Project occupants to pollutant concentrations from a wildfire; no impact would occur and no mitigation is required.

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

Less than Significant Impact. Proposed development of the currently undeveloped site with a Fleet Services Facility, paved surfaces, and irrigated landscaping would reduce the existing wildfire risk by significantly decreasing the on-site vegetative fuel load. Infrastructure improvements such as access roads, water and sewer lines, and stormwater drainage systems would be installed within the Project site and would connect to existing utility systems. These improvements are typical of urban development and would not introduce features known to increase fire risk, such as elevated power lines. The Project would also coordinate with OCFA to ensure compliance with applicable fire protection and emergency access requirements. Impacts related to installation or maintenance of associated infrastructure that could exacerbate fire risk or result in temporary or ongoing environmental effects would be less than significant. No mitigation is required.

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

No Impact. As previously discussed in Section 5.7.1 Threshold a)iv), the Project site is not within, nor adjacent to a Landslide Zone (DOC 2024b). There are no substantial hazards with respect to slope stability given the Project site and surrounding areas are mostly flat. Additionally, the Project site is

designated as a Zone X Area of Minimal Flood Hazard (FEMA 2009). No impact related to exposing people or structures to significant risks would occur and no mitigation is required.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

5.21.1 Impact Analysis

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

Less than Significant Impact. As discussed in Section 5.4, *Biological Resources*, the Project site is fully developed and dominated by disturbed ruderal vegetation, ornamental landscaping, and existing infrastructure, with little to no biological habitat value. The Biological Reconnaissance Survey determined that all 44 special status plant species evaluated are absent from the Project site, and no suitable habitat is present to support their occurrence. Similarly, of the 14 special status wildlife species with a potential to occur in the vicinity, 13 are absent due to the highly urbanized conditions and lack of required habitat features, and one species (burrowing owl) has only a low potential to occur due to minimal marginal habitat. No special status species were observed during field surveys, and the Project site does not function as wildlife habitat, a movement corridor, or a nursery site. The Project would not result in habitat loss, population declines, or reductions in the range or abundance of rare, threatened, or endangered species, nor would it threaten the elimination of any plant or animal community.

In addition, as discussed in Section 5.5, *Cultural Resources*, no historical resources or significant archaeological resources were identified within the Project site. While there is a low potential for encountering buried archaeological materials associated with historic agricultural use, implementation of standard conditions (SC CUL-1) would ensure that any inadvertent discoveries are properly evaluated and treated in accordance with applicable regulations. With mitigation, impacts to archaeological resources would be less than significant, and the Project would not eliminate or adversely affect important examples of the major periods of California history or prehistory.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)*

Less than Significant Impact. The Project involves development of a public fleet services facility to consolidate two existing fleet facility sites into one location, including a 45,706 SF maintenance building, a future 20,000 SF operations building, solar canopy, parking, access road, and disposal lot. Its scale, use, and operational characteristics are consistent with existing land uses in the surrounding area and do not introduce land uses, traffic, emissions, or noise levels that would substantially add to cumulative environmental effects.

When considered in combination with the related projects (see Table 3) in the surrounding area (including the Park 55 Industrial Redevelopment Project, Warner Redhill Mixed-Use Development, Legado at the Met, Santa Ana Lyon Towns, MLC Holdings/Meritage Homes, Cabrillo Crossing Townhomes, The Madison, Central Pointe Mixed-Use Development, and Think Together Residential Development) the Project's incremental contribution to cumulative impacts would be negligible. Each of these projects involves redevelopment or new construction in urbanized areas and is subject to its own environmental review under CEQA, including assessment of potential impacts such as land use, traffic, air quality, noise, and utilities. Therefore, the environmental effects of those projects are being addressed independently, and any potential cumulative effects are already mitigated or minimized through their respective approvals and mitigation measures.

The proposed Project itself does not introduce new significant impacts, and because the Project is small relative to the scale of development in the surrounding area, its addition would not meaningfully increase cumulative effects. Compliance with existing regulations and standard operational controls (e.g., for traffic circulation, stormwater management, and site operations) further ensures that the Project's contribution to cumulative environmental impacts is not considerable. Additionally, the Project would relocate and consolidate existing County fleet services operations and would not introduce a new public-serving land use. Because it reorganizes an existing function rather than expanding service capacity or intensity, the Project would not generate substantial new demand for traffic, utilities, or other infrastructure that could otherwise result in a cumulatively considerable impact.

Accordingly, the Project's incremental effects, when considered in combination with past, present, and reasonably foreseeable future projects, would not be cumulatively considerable.

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

Less than Significant Impact. Environmental effects that may cause substantial adverse effects on humans typically result from impacts related to air quality and GHGs; noise; hazardous materials; ground shaking; hazardous design features with respect to transportation and roadway designs; and wildfire. The analysis contained in Sections 5.3, 5.7, 5.8, 5.9, 5.13, 5.17, and 5.20 of this document indicates that impacts would be less than significant to the environmental areas mentioned above and, therefore, would not cause substantial adverse impacts to human beings. Impacts towards human beings, either directly or indirectly, would be less than significant.

SECTION 6.0 – MITIGATION MONITORING AND REPORTING PROGRAM

Public Resources Code, Section 21081.6 (Assembly Bill 3180) requires that mitigation measures identified in environmental review documents prepared in accordance with CEQA are implemented after a project is approved. Therefore, this MMRP has been prepared to ensure compliance with the adopted mitigation measures during the construction phase and operation phase of the Fleet Services New Building Project.

The County is the agency responsible for implementation of the mitigation measures identified in the MND. This MMRP provides the County with a convenient mechanism for quickly reviewing all the mitigation measures including the ability to focus on select information such as timing. The MMRP includes the following information for each mitigation measure:

- The phase of the project during which the required mitigation measure must be implemented;
- The phase of the project during which the required mitigation measure must be monitored; and
- The enforcement agency.

The MMRP includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor, the date of the monitoring activity, and any related remarks for each mitigation measure.

In addition to the Mitigation Measures shown in the MMRP, the Project shall implement Standard Conditions of Approval (SCs) and Regulatory Compliance Measures (RCMs). SCs and RCMs are existing requirements, regulations, and standard practices that apply to the Project independent of CEQA and are not mitigation measures adopted to reduce or avoid significant environmental impacts.

MITIGATION MONITORING AND REPORTING PROGRAM Fleet Services New Building Project							
Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Level of Significance After Mitigation	Verification of Compliance		
					Initial	Date	Remarks
Geology and Soils							
MM PAL-1 Prior to the issuance of a grading permit, the County shall be required to obtain the services of a Qualified Project Paleontologist to remain on call for the duration of the proposed ground-disturbing construction activity. The paleontologist selected must be approved by the County. Upon approval or request by the County, a Paleontological Mitigation Plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the Project and submitted to the County for review and approval. The development and implementation of the PMP shall include consultations with the County’s Engineering Geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the County. If the County accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP	Pre-Construction and Construction	Construction and Post-Construction	Orange County	Less than Significant			

MITIGATION MONITORING AND REPORTING PROGRAM Fleet Services New Building Project							
Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Level of Significance After Mitigation	Verification of Compliance		
					Initial	Date	Remarks
shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project-related ground-disturbing activities, as well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered. At the completion of all ground-disturbing activities, the Project Paleontologist shall prepare a final paleontological mitigation report summarizing any monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any. As well as providing follow-up reports and records for specific discoveries, as necessary.							

STANDARD CONDITIONS OF APPROVAL AND REGULATORY COMPLIANCE MEASURES Fleet Services New Building Project	
Measure	
Standard Conditions of Approval	
SC CUL-1	The County shall retain the services of a Qualified Archaeologist, meeting the Secretary of the Interior Standards, and County requirements. The Qualified Archaeologist shall remain on call

STANDARD CONDITIONS OF APPROVAL AND REGULATORY COMPLIANCE MEASURES Fleet Services New Building Project	
Measure	
	throughout the Project. The Qualified Archaeologist or cultural resources specialist working under the direction of the Qualified Archaeologist, shall provide an initial cultural resources sensitivity training (which may be incorporated within a more comprehensive or multi-discipline Worker Environmental Awareness Program [WEAP]) to inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The cultural resources sensitivity training is necessary to inform the construction personnel of the potential to encounter buried cultural resources and provide examples of potential cultural materials that may be encountered. The training shall be held in conjunction with the Project's initial on-site safety meeting and shall explain the applicable protocols, procedures, and legal basis for the protection of significant archaeological resources.
SC CUL-2	In the event of an inadvertent discovery of potential cultural resources (artifacts or features) during ground-disturbing activities, construction activities within a 50-foot radius of the discovery shall be halted while the Qualified Archaeologist assesses the find. The archaeologist shall evaluate the find in accordance with federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, to assess the significance of the find and identify avoidance or other measures as appropriate. If the resource is determined to be significant or unique through significance evaluation, and avoidance is not possible, appropriate mitigation or treatment shall be established and implemented. These might include a cultural resources mitigation and monitoring plan, treatment plans, or data recovery programs. All monitoring or associated plans would be prepared and implemented under the direction of the Qualified Archaeologist. All required close-out reporting or archaeological site records would be completed in accordance with the Office of Historic Preservation's guidelines and submitted to the appropriate CHRIS Information Center (IC), as necessary.
Regulatory Compliance measures	

STANDARD CONDITIONS OF APPROVAL AND REGULATORY COMPLIANCE MEASURES Fleet Services New Building Project	
Measure	
RCM CUL-1 Human Remains	In the event that human remains are encountered on the project site, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately consistent with the requirements of CCR Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the County Coroner shall notify the NAHC, which shall determine and notify a Most Likely Descendant (MLD). With the permission of the property owner, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the County shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, the Director of the Orange County Public Works Department, or designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.
RCM GEO-1 Geotechnical Investigation	Pursuant to PRC Chapter 7.8 Section 2697, prior to the approval of a project located in a seismic hazard zone, the Project proponent shall prepare a geotechnical report defining and delineating any seismic hazard. The County of Orange must have a site-specific geotechnical investigation conducted by a licensed professional to identify and evaluate the potential for seismic-related ground failure, including liquefaction, and to recommend appropriate design and construction project features or measures to be implemented for the Project.

STANDARD CONDITIONS OF APPROVAL AND REGULATORY COMPLIANCE MEASURES Fleet Services New Building Project	
Measure	
RCM HYD-1 Construction General Permit	Prior to issuance of a grading permit, the Project Applicant shall obtain coverage under the SWRCB National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Project Applicant shall provide the Waste Discharge Identification Number (WDID) to the Director of the County of Orange (County) Public Works Department, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the Director of the County Public Works Department, or designee. A SWPPP shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The SWPPP should identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via the SMARTs.

STANDARD CONDITIONS OF APPROVAL AND REGULATORY COMPLIANCE MEASURES Fleet Services New Building Project	
Measure	
RCM HYD-2 MS4 Permit	Prior to the issuance of grading or building permits, the Project Applicant shall submit a Final WQMP to the Orange County Public Works Department, or designee, for review and approval in compliance with the requirements of the NPDES <i>Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the Orange County Region</i>, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). The Final WQMP shall be prepared consistent with the requirements of the County of Orange Technical Guidance Document for Water Quality Management Plans (TGD) and the North Orange County Water Quality Management Plan template, or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The Orange County Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design, and shall implement, maintain and operate all such BMPs in a timely and reasonably diligent manner.
RCM HYD-3 Final Hydrology Report	Prior to issuance of a grading permit, the Project Applicant shall prepare a Final Hydrology Report to demonstrate that the post-construction runoff from the project site does not exceed existing conditions. The Project Applicant shall provide the Final Hydrology Report to the Director of the Orange County Public Works Department, or their designee, for review and approval.

SECTION 7.0 – REFERENCES

Airport Land Use Commission (Commission)

- 2008 Land Use Plan for John Wayne Airport. Available at: https://files.ocair.com/media/2021-02/JWA_AELUP-April-17-2008.pdf?VersionId=cB0byJdad9OuY5im7Oaj5aWaT1FS.vD

California Department of Conservation (DOC)

- 2015 Fault Activity Map of California. Available at: <https://maps.conservation.ca.gov/cgs/fam/>
- 2022 California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>
- 2024a Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>
- 2024b Earthquake Zones of Required Investigation. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e4b825-layer-21%3A1184
- 2025 Well Finder. Available at: <https://maps.conservation.ca.gov/calgem/wellfinder/Index.html?gtapi=02590001&config=WellFinder>

California Department of Forestry and Fire Protection (CALFire)

- 2025 Fire Hazard Severity Zone View. Available at: <https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0>

California Department of Transportation (Caltrans)

- 2025 California State Scenic Highways System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

California Department of Water Resources (DWR)

- 2019 Orange County Water District, City of La Habra, Irvine Ranch Water District. Available at: <https://sgma.water.ca.gov/portal/alternative/print/3>
- 2025 SGMA Basin Prioritization Dashboard. Available at: <https://gis.water.ca.gov/app/bp-dashboard/final/>

CalRecycle

- 2006 Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups. Available at: <https://www2.calrecycle.ca.gov/Publications/Details/1184>
- 2025a SWIS Facility/Site Activity Details Olinda Alpha Landfill. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2757?siteID=2093v>

2025b SWIS Facility/Site Activity Details Frank R. Bowerman Landfill. Available at:
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2767?siteID=2103>

2025c SWIS Facility/Site Activity Details Prima Deshecha Landfill. Available at:
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2750?siteID=2085>

City of Santa Ana (City)

2019 City of Santa Ana Traffic Impact Study Guidelines. Available at: <https://www.santa-ana.org/documents/traffic-vmt-impact-study-guidelines/>

2021 Environmental Documents, Updated Draft PEIR. Available at: <https://general-plan-santa-ana-ca.proudcity.com/other-resources/environmental-documents/>

2022a Land Use Plan. Available at:
<https://storymaps.arcgis.com/stories/f200c8e3433b41948e2340024ff8cd1d>

2022b Santa Ana General Plan. Available at: <https://general-plan-santa-ana-ca.proudcity.com/>

2024 Zoning Map. Available at:
https://storage.googleapis.com/proudcity/santaanaca/2025/01/Zoning_FULL_CITY_2024.pdf

County of Orange (County)

1996 Natural Community Conservation Plan & Habitat Conservation Plan & EIR & EIS County of Orange Central & Coastal Subregion. Map Section (Figures 1 through 76). Available at
<https://occonservation.org/wp-content/uploads/2015/04/NCCP-EIR-Map-Section.pdf>

2019 Unified County of Orange and Orange County Operational Area Emergency Operations Plan. Available at: <https://www.ochealthinfo.com/sites/hca/files/2021-08/Final%20Approved%20Unified%20County%20of%20Orange%20-%20Orange%20County%20Operational%20Area%20EOP%20August%202019.pdf>

2020a Transportation Implementation Manual. Available at:
https://ocds.ocpublicworks.com/sites/ocpwocds/files/2022-02/TIM_2021_FINAL_signed_with_Resolution_Number.pdf

2020b Guidelines for Evaluating Vehicle Miles Traveled Under CEQA. Available at:
<https://files.ceganet.lci.ca.gov/283706-1/attachment/G8vtD3TFoaXEGia2bea02s2kgcfVuHy824HDUfR9SrRhPudwrV8NHlspXbZ2hbTKKHlJkv0bLGNOMTPz0>

2025 General Plan. Available at: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan>

2026a 2026 Master Plan of Arterial Highways. Available at:
https://www.octa.net/img/MPAH_2026-0422-Fullsize.jpg

2026b Orange County – VMT Screening Application. Available at: <https://gis1.lsa.net/ocvmt/>

Department of Toxic Substances Control

2025 Envirostor. Available at:
<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1400+south+grand+avenue+santa+ana>

Federal Emergency Management Agency (FEMA)

2009 National Flood Hazard Layer. Available at:
<https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>

Google

2025 Google Earth. Available at: <https://earth.google.com/web>

Municipal Water District of Orange County (MWDOC)

2021 2020 Urban Water Management Plan. Available at: https://www.mwdoc.com/wp-content/uploads/2021/06/MWDOC-2020-UWMP_2021.06.02.pdf

Orange County Sanitation District (OCSd)

2025 Regional Sewer Service Facts and Key Statistics. Available at:
<https://www.ocsan.gov/regional-sewer-service/#waterreclamation>

State Water Resources Board (SWRCB)

2025 Geotracker. Available at
https://geotracker.waterboards.ca.gov/map/?global_id=T0607100280

United States Department of Agriculture (USDA)

2009 Chapter 7: Hydrologic soil groups. National Engineering Handbook, Part 630. Available at: <https://directives.nrcs.usda.gov/sites/default/files2/1712930597/11905.pdf>

2024 Web Soil Survey. Available at:
<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

United States Department of Fish and Wildlife (USFWS)

2026 National Wetlands Inventory. Available at:
<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

APPENDIX A – AIR QUALITY, ENERGY, AND GREENHOUSE GAS EMISSIONS IMPACT ANALYSIS



APPENDIX B – BIOLOGICAL RECONNAISSANCE SURVEY



APPENDIX C – CULTURAL RESOURCES SURVEY LETTER REPORT



APPENDIX D – PHASE I ENVIRONMENTAL IMPACT ASSESSMENT



APPENDIX E – HYDROLOGY AND HYDRAULICS REPORT



APPENDIX F – NOISE IMPACT ANALYSIS



APPENDIX G – VMT SCREENING MEMORANDUM



APPENDIX H – RECORD OF TRIBAL CONSULTATION EFFORTS

