INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

GENERAL PLAN/MUNICIPAL CODE REVISIONS
Heavy Commercial (HC) and Heavy Commercial (C-3)

HILTON HOTEL PROJECT
13624-13650 Harbor Boulevard
Garden Grove, California

General Plan Amendment No. GPA-002-2018
Amendment No. A-024-2018
Site Plan No. SP-056-2018
Conditional Use Permit No. CUP-134-2018
Lot Line Adjustment No. LLA-018-2018

GARDEN GROVE

Lead Agency:
City of Garden Grove
Community Development Department
11222 Acacia Parkway
Garden Grove, California 92840

Applicant:
Garden Grove Hotel, LLC
2439 Manhattan Place, Suite 221
Harley, Louisiana 70058
(504) 371-6666

October 24, 2018

1.0 INTRODUCTION

The proposed Project calls for the approval, construction, and operation of a 124-room Hilton Hotel Project located at 13624-13650 Harbor Boulevard within the City of Garden Grove. The project includes: (1) a proposed amendment to the Land Use Element of the "City of Garden Grove General Plan 2030" (General Plan) modifying the allowable floor area ratio (FAR) for the "Heavy Commercial (HC)" district; and (2) proposed revisions to Title 9 (Land Use) of the "City of Garden Grove Municipal Code" (GGMC) modifying the development standards for the GGMC's "Heavy Commercial (C-3)" zone.

The proposed Project is subject to the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines for the Implementation of the California Environmental Quality Act (Guidelines), as codified in Section 15000-15387 in Title 14 (Natural Resources) of the California Code of Regulations (CCR). Consistent with CEQA Guidelines Section 15071, this initial study/mitigated negative declaration (IS/MND) includes a description of the proposed Project, an evaluation of the potential environmental impacts, and findings from the environmental analysis. The City of Garden Grove (City) is the Lead Agency under CEQA and is responsible for adoption of the IS/MND and approval of the proposed Project.

1.1 Contact Person

This document has been prepared by or on behalf of the City and reflects its independent judgment and analysis. Any questions or comments regarding the preparation of this IS/MND, its assumptions, or its conclusions should be referred to:

Paul Guerrero, Planner
City of Garden Grove, Community and Economic Development
11222 Acacia Parkway
Garden Grove, CA 92840
Tel: (714) 741-5312
Email: paulg@ci.garden-grove.ca.us

2.0 PROJECT DESCRIPTION

2.1.1 Regional Setting

The project site is located at 13624-13650 Harbor Boulevard, located in the southeastern portion of the City, which itself is located in northern Orange County. The City encompasses approximately 18 square miles of land within the County, and is bounded by the Cities of Anaheim, Stanton, and Cypress to the north; the City of Orange to the east; the Cities of Santa Ana, Westminster, and Fountain Valley to the south; and the City of Los Alamitos to the west.

Regional access to the project site is provided by State Route 22 (SR-22). SR-22 bisects the southern portion of the City in an east-west direction and is approximately 800 feet north of the proposed Project site.

2.1.2 Project Vicinity and Surrounding Land Uses

The 1.48-acre project site consists of Assessor's Parcel Numbers 101-08-066 and 101-08-027. Generally, the project site is surrounded by heavy commercial uses, Santiago High School's athletic fields, a storm channel, and multi-family residential uses.

Specifically, the project site is bounded immediately to the west by Harbor Boulevard, and, beyond Harbor Boulevard to the west by heavy commercial uses including a used car dealership. To the northwest, the project site is bounded by Harbor Boulevard and, beyond Harbor Boulevard, heavy commercial uses including transportation uses operated by Yellow Cab and Western Transit Systems, Inc. To the north, the project is immediately bounded by an Orange County Flood Control storm channel, then further north by a heavy commercial use operating as an auto collision repair and paint business. To the north and north east, the project site is bounded by an Orange County Flood Control storm channel, then to the further north and north east by multi-family residential uses. To the east and southeast, the project site is bounded by Santiago High School's athletic field which is zoned as Open Space. And, to the south, the project site is bounded by a heavy commercial use operating as an auto body and repair business.

2.1.3 Existing Project Site

Former uses of the project site included an automotive dealership (Garden Grove Mazda) and an automotive repair center (Harbor Auto Center) containing 17,216 square feet of improvements including a paved yard with 150 parking spaces. (See Figure 1 - 13624-13650 Harbor Boulevard – Former Garden Grove Mazda and Harbor Auto Center [2017]). These improvements were demolished in or about July of 2017.

2.1.4 Existing General Plan Designation and Zoning Classifications

The project site is currently designated "HC – Heavy Commercial." The Heavy Commercial designation is intended to provide for a variety of more intensive commercial uses including automotive repair, sales and services, wholesaling, automotive body work, or contractor's storage yards. (GGGP, p. 2-24.) The project site is Zoned C-3, Heavy Commercial.

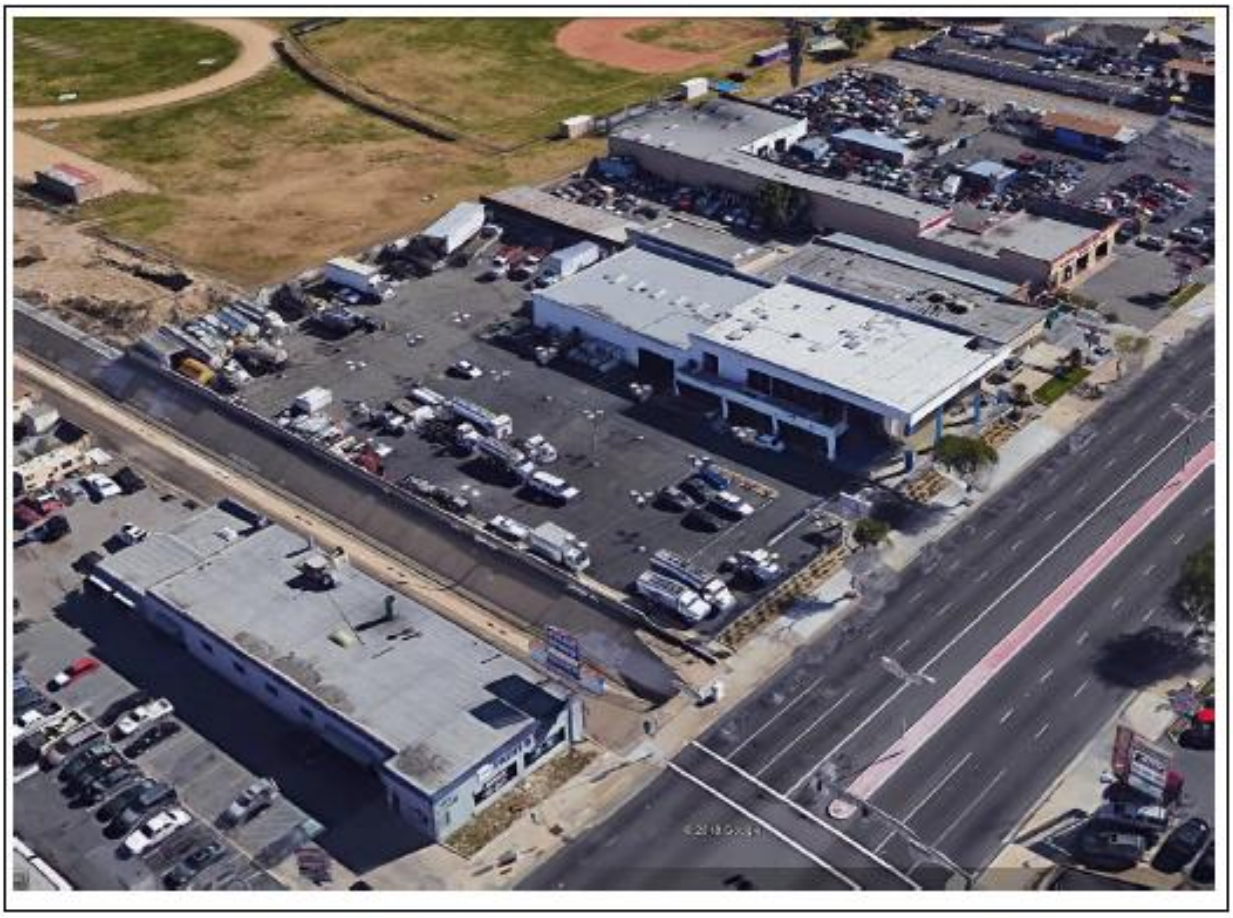


Figure 1
13624-13650 HARBOR BOULEVARD FORMER GARDEN GROVE MAZDA AND HARBOR AUTO CENTER (2017)
Source: Google Earth and City of Garden Grove Community and Economic Development Department

2.2 Proposed Project

At the location depicted in Figure 14 (Hilton Hotel Project - Local Vicinity Map), is the approval, construction, and operation of a 62,763 square foot, 124-room, 5-story, 59-foot-tall hotel, including 100 on-site parking spaces and related incidental and accessory uses, located on an approximately 1.48-acre project site at 13624-13650 Harbor Boulevard (APN: 101-08-066, 101-08-027), including all associated discretionary permits and approvals (proposed Project).

The proposed Project will include guest amenities such as a fitness room, outdoor pool and deck area adjacent to Harbor Boulevard, outdoor seating areas with a firepit, a "corner market," and guest laundry services.

Development of the proposed Project would require the following approvals from the City: General Plan Amendment (GPA-002-2018); (2) Municipal Code Amendment (No. A-024-2018); (3) Site Plan (SP-056-2018); (4) Conditional Use Permit (CUP-134-2018); and (5) Lot Line Adjustment (LLA-018-2018).

2.2.1 Ingress and Egress

Based on the presence of an existing median along Harbor Boulevard, ingress to and egress from the proposed Project will be provided via a "right-in" and "right-out" only. Two multi-directional driveways will provide direct access to and from Harbor Boulevard.

The northern driveway will provide access to a double-loading perpendicular parking aisle and direct access to the hotel's main entry. A separate covered turn-out area, apart from the driveway aisle, will be provided for registering and departing guests and for pick-up and drop-off purposes. A clearance height of 13'6" will be provided to accommodate buses (including tour buses), delivery trucks, and emergency vehicles.

The southern driveway will provide access to a single-loading perpendicular parking aisle, with parking placed along the southern property line. The two driveways establish an internal circulation pattern that provide direct access to the north, east, and south sides of the hotel and offer unimpeded access for guests, delivery vehicles, and emergency service providers.

2.2.2 Parking

Section 9.16.020.050(A)(J) of the GGMC currently requires one (1) parking space per hotel unit, plus two (2) additional spaces for the "hotel manager's unit" if a manager's unit is provided. The proposed Project does not include a manager's unit. The proposed Project's 124 rooms would thus require 124 parking spaces (124 X 1.0 = 124). The proposed Project includes a proposed revision to Section 9.16.020.050(A)(J) of the GGMC which would authorize the hearing body to permit up to a 20% reduction in the required parking. Here, a 20% reduction in the required parking would result in a total of 99.2 required parking spaces (124 x 0.20 = 99.2). Assuming the requested parking reduction is approved, the proposed 100 parking spaces would satisfy the parking requirement. Parking spaces would be provided around the perimeter of the hotel.

2.2.3 Landscaping

The proposed Project calls for approximately 13,455 square feet of landscaping, to include trees, shrubs, vines, and ground covers. All landscape areas will be irrigated using drip or low volume

irrigation and will be controlled by a smart controller. All of the proposed Project's proposed landscaping will be required to comply with the City's water conservation requirements.

2.2.4 Infrastructure Improvements

The proposed Project includes the installation of a new 8" sewer lateral, which will connect to the existing 12" sewer line in Harbor Boulevard, as well as the installation of a new 6" water lateral which will connect to the existing 12" water line in Harbor Boulevard. The proposed Project also includes the installation of a gas line that would connect to the existing gas line in Harbor Boulevard.

2.2.5 Non-Motorized Transportation and Transit Services

Bicycle Parking. As indicated on the City's "Master Plan of Bikeway Facilities," that segment of Harbor Boulevard extending between Chapman Avenue on the north and Westminster Avenue on the south is a Class I (On-Street) bikeway. It is also noted that Harbor Boulevard, between Garden Grove Boulevard and Westminster Avenue is a City-designated truck route, placing bicyclists and truck traffic along a common shared roadway.

To accommodate any guests or employees who elect to bicycle, as specified in Sections 9.12.040.190(G) and 9.16.040.160(E) of the GGMC: "All nonresidential buildings and places of assembly shall provide adequate locking facilities for bicycle parking at any location convenient to the facility for which they are designated." The proposed Project will provide parking for five or more bicycles and is thus in compliance with the GGMC.

Transit Services. Harbor Boulevard is the County's busiest north/south transit corridor, carrying approximately eight (8) percent of County-wide bus ridership through some of the densest areas of the County.

The Orange County Transportation Authority (OCTA) presently operates: (1) two bus routes (Routes 43 and 543) along that segment of Harbor Boulevard between Trask Avenue on the north and Westminster Avenue on the south; and (2) one bus route (Route 56) along that segment of Garden Grove Boulevard between Fairview Street on the west and Lewis Street on the east.

OCTA provides northbound and southbound bus shelters in the vicinity of the intersection of Harbor Boulevard and Woodbury Road. The northbound bus shelter is located approximately 250 feet south and the southbound bus shelter is located about 400 feet south of the proposed Project's boundaries along Harbor Boulevard. The "Circulation Element" of the GGGP states that "Route 43, which travels along Harbor Boulevard, is the busiest bus route in the County."

Traveling eastbound and westbound along Garden Grove Boulevard, OCTA bus stops, equipped with schedule information, are located west of Lewis Street and east of Fairview Street. The absence of bus shelters signifies OCTA's determination that Route 56 is not a high passenger demand bus route.

OC Streetcar. On January 20, 2015, the City of Santa Ana, in cooperation with the Federal Transportation Administration (FTA) and OCTA, certified the "Revised Environmental Assessment/Final Environmental Impact Report for the Santa Ana-Garden Grove Fixed Rail Guideway Project, SCH No. 2010051060" (2015 REA/FEIR) for a proposed 4.2-mile fixed-rail transit corridor extending through Santa Ana and terminating in the southeastern portion of the City. The planned western terminus of the "Santa Ana-Garden Grove Fixed Rail Guideway

Project" (OC Streetcar) is planned at the northeasterly corner of Harbor Boulevard and Westminster Avenue. Fixed-rail service is planned to operate every ten minutes during peak periods and every 15 minutes during both off-peak periods and weekends.

2.2.6 Construction

If the proposed Project is approved, construction is anticipated to commence in January of 2019 and to take approximately 226 working days to complete, or approximately December of 2019. The proposed Project, if approved, would begin operating in 2020.

2.3 Required Project Approvals

The requested approvals include, but may not be limited to: (1) a general plan amendment; (2) a municipal code amendment; (3) site plan approval; (4) conditional use permit; and (5) lot line adjustment.

The proposed GGGP amendment would increase the authorized maximum FAR for hotels within the "Heavy Commercial (HC)" district from 0.6 to 1.0 so that the range of permissible hotel development in that zone will range from 0.55 to 1.0 FAR.

The proposed GGMC amendments would: (1) establish separate development standards (as measured in allowable FAR) for hotel and other uses in the "Heavy Commercial (C-3)" zone so that, consistent with the GGGP, the range of permissible hotel development will range from 0.55 to 1.0 FAR and the maximum FAR for all other uses will be 0.55; (2) increase the maximum allowable number of "stories" for hotels in the "Heavy Commercial (C-3)" zone from a maximum of 4 to 5 stories; and (3) increase the maximum building height for hotels in the "Heavy Commercial (C-3)" zone from 55 to 60 feet.

A total of 25 properties in the City, located both in the GGGP's "Heavy Commercial (HC)" district and in the GGMC's "Heavy Commercial (C-3)" zone, could potentially avail themselves of the proposed increase in allowable FAR, number of stories, and height limit. Each of those properties were evaluated in the context of the eligibility criteria specified in Section 9.16.020.050 (Special Operating Conditions and Development Standards) of the GGMC to determine which, if any, sites met the City's minimum standards for hotel use. Based on that evaluation, a total of 11 properties were identified, collectively totaling approximately 18.78 acres. Based on the revised FAR, if fully developed to the proposed 1.0 FAR standard, a total of 818,166 square feet of new hotel uses could be hypothetically developed within the study area. Assuming hotel densities of 50, 75, and 100 guestrooms per acre, an estimated 936, 1,405, and 1,874 new hotel units could potentially be developed within the "Heavy Commercial (C-3)" zone, respectively.

With the exception of Parcel No. 8 (13624-13650 Harbor Boulevard) and Parcel No. 13 (13731 Harbor Boulevard), none of the properties within the study area are presently within the City's permit process. Parcel No. 8 is the site of the proposed Project and Parcel No. 13 recently completed site plan review for a new automobile dealership (Garden Grove Kia). With those exceptions, no conceptual or detailed development plans have been submitted by representatives of other properties within the study area seeking the City's approval or conditional approval for either hotel development or an increase in the intensity of non-hotel-related development to or beyond the FAR limits presently established in the GGGP and/or GGMC.

Hotel development within the City is primarily limited to those areas located to the north of the Garden Grove (SR-22) Freeway. For years, the City has been actively promoting the development of new hotels south of the Garden Grove (SR-22) Freeway but without success. With the single exception of the proposed Project (13624-13650 Harbor Boulevard), no formal or

informal expressions of interest have been received by the City from property owners or from the development community regarding potential hotel development opportunities on the 25 properties examined herein. The City has, therefore, determined that the prospects of any such hotel development are presently speculative. It is unclear whether the proposed modifications will lead to future development of higher density or taller hotels. The type of future hotel development that will be proposed, if any, is purely speculative at this time. Indeed, future development could be proposed at lower densities or lower heights. (*Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266, 293-95 [finding the potential environmental effects of ordinance removing density limitations and increasing permitted hotel heights were too speculative to be analyzed in an initial study and upholding the challenged negative declaration.].) In accordance with Sections 15064 and 15145 of the Guidelines, the City has concluded that any future hotel development within the study area resulting from the proposed approvals is not reasonably foreseeable.

Additionally, proposed amendment to the GGGP would reduce the maximum allowable FAR from 0.60 to 0.55 FAR within the "Heavy Commercial (HC)" district and "Heavy Commercial (C-3)" zone for other uses. None of the 25 properties examined within the study area are presently developed to a 0.55 FAR. No conceptual or detailed plans have been submitted to the City for any of those properties seeking the City's approval or conditional approval to increase the intensity of those properties for any other uses to or beyond the City's current limit. As a result, the City has concluded that the proposed change in allowable FAR for all "other uses" would not result in any reasonably foreseeable changes in the environment. (*See Aptos Council*, *supra,* 10 Cal.App.5th at 293-95.)

For these reasons, the initial study for the proposed Project evaluates the potential environmental impacts of the proposed hotel.

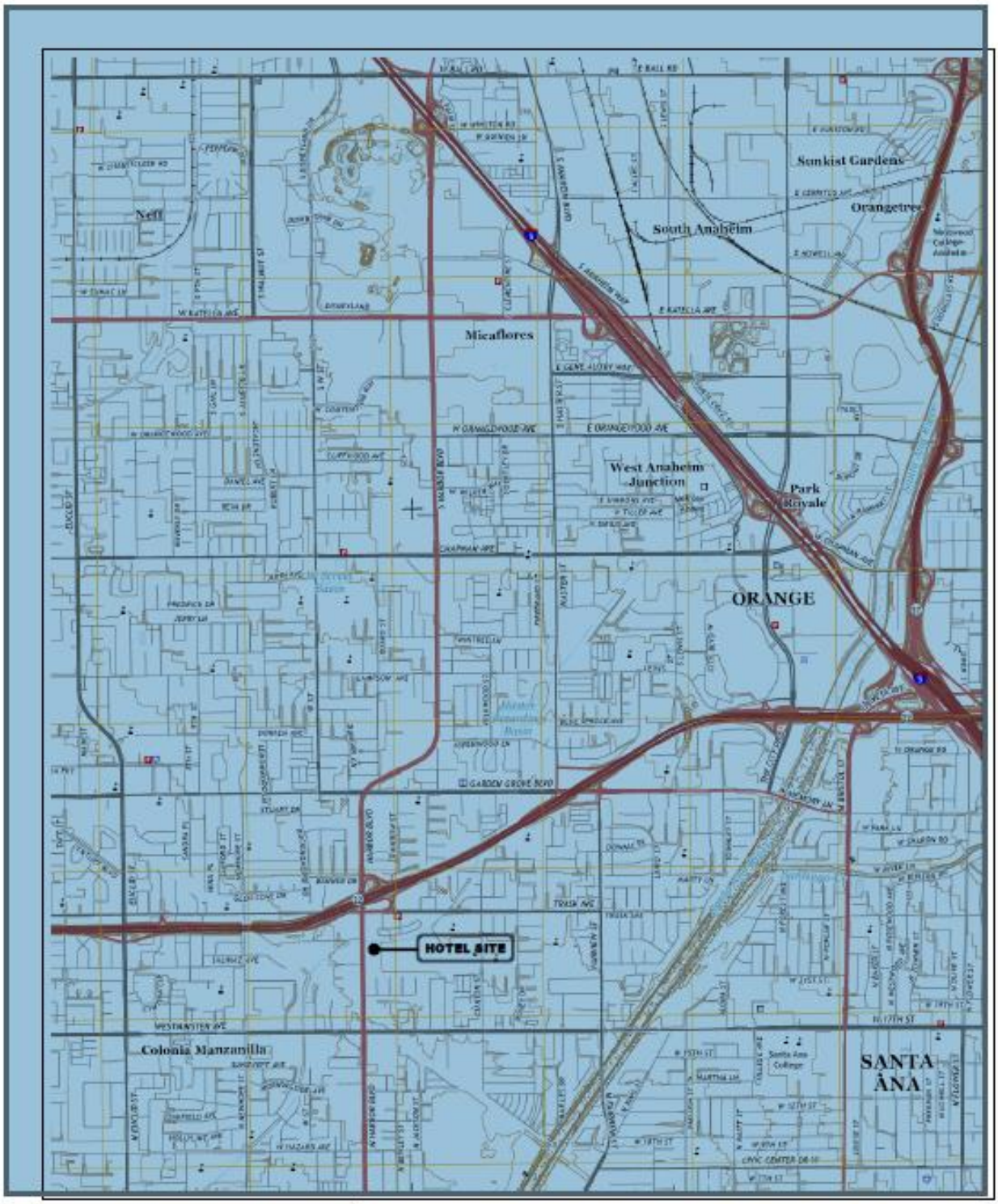


Figure 14
PROJECT NO. 2: HILTON HOTEL PROJECT LOCAL VICINITY MAP
Source: United States Geological Survey, Anaheim 7.5-Minute Quadrangle (2015)

Environmental Factors Potentially Affected

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

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

Determination

On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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

_____ _____, 2018

Signature Date

_____ _____, 2018

Printed Name Date

Environmental Checklist

1. Aesthetics

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Findings of Fact

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

No Impact. California State Government Code Section 65560(b)(3) requires that city and county General Plans address "…Open space for outdoor recreation, including but not limited to, areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes, including access to lakes shores, beaches, and rivers, and streams; and areas that serve as links between major recreation and open-space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors…"

A scenic vista is the view of an area that is visually or aesthetically pleasing from a certain vantage point. It is usually viewed from some distance away. Aesthetic components of a scenic vista include (1) scenic quality, (2) sensitivity level, and (3) view access.

A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed Project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City's General Plan does not identify specific areas of importance for visual quality or scenic resources within the City. Rather, the City included a Parks, Recreation, and Open Space Element in its General Plan because providing adequate parkland, recreation opportunities, and management and conservation of limited open space resources is a priority to the urbanized City.

The nearest neighborhood parks are Cesar Chavez Campesino Park (W. 5th Street, Santa Ana) and Twin Lakes Freedom Park (12952 Lampson Avenue, Garden Grove), located approximately 1.0 mile to the southeast and 1.1 miles to the northeast, respectively. No regional parks are located in proximity to the proposed Project. Public golf courses in the general project area include Willowick Golf Course (3017 W. 5th Street, Santa Ana) and Riverview Golf Course (1800 W. Santa Clara Avenue, Santa Ana), located about 0.6 and 1.2 miles away, respectively. Thus, the proposed Project does not have the potential to impact scenic vistas from public parks.

The general project area is in a fully urbanized area of the City, currently comprised of mostly one and two-story commercial and industrial buildings separated by large expanses of at-grade parking lots with few interspersed street trees and little adjoining landscaping. With the exception of the proposed hotel site, no vacant lot or undeveloped properties exist along that segment of Harbor Boulevard. Since a number of presently operating uses are involved in the sale, repair, and maintenance of automobiles, the number of vehicles observable from Harbor Boulevard is substantially greater than would be expected based on the scale of the existing development and a more typical commercial and industrial mix of uses along most major arterials. The approximately 0.5-mile length of Harbor Boulevard extending from Trask Avenue on the north to Westminster Avenue on the south is highly urbanized, as evident by the quantity of land covered with impervious surfaces and scattered ornamental landscape. This segment of Harbor Boulevard lacks any distinctive visual character or scenic views. Therefore, the proposed Project does not have the potential to damage scenic vistas, and no mitigation would be 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*.* The California Department of Transportation's (Caltrans) Landscape Architecture Program administers the Scenic Highway Program contained in the Streets and Highways Code, Sections 260–263. State Highways are classified as either Officially Listed or Eligible. The nearest State-designated scenic highway to the project site is State Route 91 (SR-91).[1] Harbor Boulevard is not a State-designated scenic highway. Therefore, the proposed Project does not have the potential to damage resources within a State-designated scenic highway.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less-than-Significant Impact*.* The project site is located within a fully developed, urban environment. The area is characterized by a variety of commercial uses ranging in height from 1-2 stories along the Harbor Boulevard corridor. The project site was previously operated as an automotive dealership (Garden Grove Mazda) and an automotive repair center (Harbor Auto Center) with associated signage, lighting, and parking. There are no trees or other landscaping on the existing project site.

Construction**.** The proposed Project calls for the construction and operation of a 5-story, 59-foot, 124-room hotel. Construction of the proposed Project would involve on-site preparation, grading and construction activities that would be visible from public streets (mainly, Harbor Boulevard). Visual impacts during construction, however, would be temporary because

[1] California Department of Transportation (Caltrans). California Scenic Highway Mapping System. Website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

construction is scheduled to last only 226 working days and would end upon project completion.

Operation. The hotel will incorporate a contemporary, cohesive architectural design style that will be complemented by a variety of 24" box trees, shrubs, bougainvillea vines, and ground covers including extensive planting areas on the Harbor Boulevard frontage. The hotel would feature large glass windows and exterior walls painted in a neutral palette with brand-themed accents. The proposed Project would also include decorative, non-slip paving at both ingress and egress locations and a covered trash enclosure. The height of the hotel would be approximately 3 stories taller than adjacent uses, however, the proposed Project would improve the visual character and quality of the project site by introducing a consistent architectural scheme and new landscaping. Therefore, impacts related to the degradation of the visual character or quality of the site would be less than significant. No mitigation would be required.

d) Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Less-than-Significant Impact. Reflective light (glare) is caused by sunlight or artificial light reflecting from finished surfaces (e.g., window glass) or other reflective materials. Glass and other materials can have many different reflectance characteristics. Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare. Reflective light is common in urban areas. Glare generally does not result in the illumination of off-site locations but results in a visible source of light viewable from a distance.

The impact of nighttime lighting depends upon the type of use affected, the proximity to the affected use, the intensity of specific lighting, and the background or ambient level of the combined nighttime lighting. Nighttime ambient light levels may vary considerably depending on the age, condition, and abundance of point-of-light sources present in a particular view. The use of exterior lighting for security and aesthetic illumination of architectural features may contribute to ambient nighttime lighting conditions.

The proposed Project's facade would primarily consist of concrete that has low reflectivity. The proposed Project calls for large windows throughout the hotel. Reflective glass, however, has not been selected for these windows and therefore they are not anticipated to create new sources of glare.

The proposed Project would be located within a developed area of the City which currently emits lighting that is typical for an urban area (including commercial and residential uses). The proposed Project calls for approximately 11 pole-mounted LED lights to provide nighttime lighting around the perimeter of the project site, adjacent to project parking. These lights would be directed downward to minimize off-site spill, and would be required to comply with the lighting standards established in the Municipal Code (see, for example, Municipal Code § 9.16.040.200(B)(4).). The photometric study prepared for the proposed Project indicates that the light generated by these new lights will remain within the project site. While the proposed Project will include "new" light sources, the level of illumination is estimated to be substantially less than that associated with the property's prior use.

The proposed Project also calls for a lighted element on the roof of the hotel, referred to as a "beacon," consisting of light fixtures that will back-light white frosted acrylic panels. The proposed panels would diffuse the light generated by the light fixtures within the acrylic panels.

The proposed light feature is a design element and is not intended, or required, to serve as a light source on the property. A photometric study was prepared for this design element. The study measured the amount of light that would reach both the project parking lot and property line. Due to software limitations, the study could not take into account the amount of diffusion that would be achieved by the acrylic panels, and instead assumes that the lights on the top of the hotel would not be encased. This is a worst-case scenario assumed solely for the purposes of this initial study. The photometric study demonstrates that bare light fixtures would generate 0.1 foot-candles of light in the parking lot, and 0 foot-candles at the property line. These light readings would be expected to be less, once the light fixtures are encased behind the frosted acrylic panels. The photometric study for the project is attached in Appendix A.

2. Agricultural Resources

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or with a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined by PRC Section 12220 [g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by CGS Section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Findings of Fact

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 non-agricultural use?

No Impact. As indicated in the California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program's (FMMP) "Orange County Important Farmland 2016" (July 2016), the project site is depicted as "urban and built-up land," which is defined as those lands that are "occupied by structures with a building density of at

least 1 unit to 1.5 acres, or approximately 6 structures to 10-acre parcel." As further indicated in the California Department of Conservation, Division of Land Resource Protection's "A Guide to the Farmland Mapping and Monitoring Program, 2004 Edition" (2004), the Orange County "Board of Supervisors determined that there would be no Farmland of Local Importance for Orange County." Therefore, no impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) would occur.

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

No Impact. The project site is designated and zoned as "Heavy Commercial." The project site is not zoned for agricultural use and no Williamson Act contract is in effect on the project site. As a result, the proposed Project would not conflict with agricultural zoning or any Williamson Act contracts.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined by PRC Section 12220 [g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by CGS Section 51104[g])?

No Impact. As previously stated, the project site is designated and zoned as Heavy Commercial. Neither the project site nor the surrounding uses include lands designated as "Forest Land" (Public Resources Code § 12220[g]), "Timberland" (Public Resources Code § 4526), or "Timberland Zoned for Timberland Production" (Government Code § 51104[g]) or lands meeting those statutory and regulatory definitions. As a result, no impacts would occur.

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

No Impact. The project site is within an area of the City that is characterized as an urban setting. Neither forest or timberland exists on the project site or in the surrounding area. Therefore, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. As a result, no impacts would occur.

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 conversion of forest land to non-forest use?

No Impact. There are no agricultural uses on or in the immediate vicinity of the project site. Therefore, the proposed Project would not result in the conversion of agricultural land to non-agricultural uses. As a result, no impacts would occur.

3. Air Quality

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Background Information

A detailed air quality study was completed as part of this CEQA-compliance effort. The resulting "Air Quality Analysis" (April 21, 2018) is included in Appendix B.

Findings of Fact

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

Less-than-Significant Impact*.* The project site is located within the City, which is located within the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) has jurisdiction over the air quality in the Basin.

In March of 2017, SCAQMD adopted the 2016 Air Quality Management Plan (AQMP). The main purpose of an AQMP is to describe air pollution control strategies to be taken within a region designated as nonattainment with the federal National Ambient Air Quality Standards (NAAQS) and/or the California Ambient Air Quality Standards (CAAQS). The Basin is in nonattainment for the federal and State standards for ozone (O_3), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition, the Basin is in nonattainment for the State standard for particulate matter less than 10 microns in diameter (PM_{10}), and is in attainment/maintenance for the federal PM10, carbon monoxide (CO), and nitrogen dioxide (CO_2) standards.

Consistency with the 2016 AQMP for the Basin would be achieved if a project is consistent with the goals, objectives, and assumptions in the respective plan to achieve the federal and State air quality standards. Per the SCAQMD *California Environmental Quality Act (CEQA) Air Quality Handbook* (April 1993), there are two main indicators of a project's consistency with the applicable AQMP: (1) whether the project would increase 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 2016 AQMP; and (2) whether the project would exceed the 2016 AQMP's assumptions for the final year for the AQMP. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. For the proposed Project to be consistent with the AQMP, the pollutants emitted from the project should not exceed the SCAQMD daily thresholds or cause a significant air quality impact. Additionally, if feasible mitigation measures are implemented and are shown to reduce the impact level from significant to less than significant, a project may be deemed consistent with the AQMP.

For the reasons explained in Section 2.3 (Required Project Approvals), it is not reasonably foreseeable that the proposed General Plan Amendment will lead to any future development other than the proposed hotel project. Additionally, the proposed Project would not be a "significant project" affecting air quality in the region as defined by the SCAQMD. Further, as explained in responses (b)-(e) below, emissions generated by the proposed Project would be below SCAQMD's *Air Quality Significance Thresholds*, and would result in less than significant air quality impacts. Therefore, the proposed Project would be consistent with, and not conflict or obstruct implementation of, the AQMP.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less-than-Significant Impact. The *State CEQA Guidelines* indicate that a significant impact would occur if a project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Specific criteria for determining whether the potential air quality impacts of a project are significant are set forth in SCAQMD's *Air Quality Significance Thresholds* (March 2015). The criteria include emission thresholds, compliance with State and national air quality standards, and conformity with the existing State Implementation Plan (SIP) or consistency with the current AQMP. A summary of the specific criteria established by the SCAQMD is presented in Table 1 below.

Projects in the Basin with emissions that exceed any of the mass daily emission thresholds are considered significant by SCAQMD.

TABLE 1

Air Pollutant	Construction Phase (lbs/day)	Operational Phase (lbs/day)
ROCs	75	55
CO	550	550
NO_X	100	55
SO_X	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55

Source: South Coast Air Quality Management District. *Air Quality Significance Thresholds* (March 2015).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particular matter less than 2.5 microns in size
PM_{10} = particular matter less than 10 microns in size
ROCs = reactive organic compounds
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides

Construction Emissions. Air quality impacts could occur during construction of the proposed Project due to soil disturbance and equipment exhaust. Major sources of emissions during demolition, grading, building construction and site work, building erection, paving and architectural coatings include: (1) exhaust emissions from construction vehicles, (2) equipment and fugitive dust generated by vehicles and equipment traveling over exposed surfaces, and (3) sand disturbances from compacting and cement paving. Fugitive dust is particulate matter suspended in the air by wind or human activities. Fugitive dust emissions would be substantially reduced by compliance with SCAQMD Rules 402 and 403. Implementation of these rules, including measures such as on-site watering at least two times daily, was accounted for in the project emission estimates.

Table 2 below summarizes construction emissions and associated impacts of the proposed Project. This table shows that construction equipment/vehicle emissions during construction periods would not exceed any of the SCAQMD daily emissions thresholds. Therefore, the air quality impacts during construction would be less than significant, and no mitigation would be required.

TABLE 2
COMPARISON OF PROJECTED CONSTRUCTION EMISSIONS AND DAILY CRITERIA VALUES[1]
(pounds/day)

Emissions Source	ROG	NOx	CO	SO_2	PM_{10} Dust	PM_{10} Exhaust	PM_{10} Total	$PM_{2.5}$ Dust	$PM_{2.5}$ Exhaust	$PM_{2.5}$ Total
Site Preparation										
Off Road Diesel	1.71	19.48	7.89	0.02	1.17	0.89	2.06	0.60	0.82	1.41
Worker Trips	0.03	0.02	0.29	0.00	0.09	0.00	0.09	0.02	0.00	0.02
Totals	1.74	19.50.	8.18	0.02	1.26	0.89	2.15	0.62	0.82	1.43
Grading										
Off Road Diesel	1.42	16.04	6.61	0.01	1.00	0.74	1.73	0.51	0.68	1.19
Worker Trips	0.04	0.02	0.29	0.00	0.09	0.00	0.09	0.02	0.00	0.02
Totals	1.46	16.06	6.90	0.01	1.09	0.74	1.82	0.53	0.68	1.21
Building Construction										
Off Road Diesel	2.27	15.98	13.49	0.02	0.00	0.92	0.92	0.00	0.88	0.88
Vendor Trips	0.04	1.14	0.33	0.00	0.06	0.01	0.07	0.02	0.01	0.03
Worker Trips	0.12	0.08	0.93	0.00	0.29	0.00	0.29	0.08	0.00	0.08
Totals	2.43	17.20	14.75	0.02	0.35	0.93	1.28	0.10	0.89	0.99
Asphalt Paving										
Off-Gas	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Emissions Source	ROG	NOx	CO	SO_2	PM_{10} Dust	PM_{10} Exhaust	PM_{10} Total	$PM_{2.5}$ Dust	$PM_{2.5}$ Exhaust	$PM_{2.5}$ Total
Off Road Diesel	0.90	9.17	8.90	0.01	0.00	0.52	0.52	0.00	0.48	0.49
Worker Trips	0.06	0.04	0.46	0.00	0.15	0.00	0.15	0.04	0.00	0.04
Asphalt Totals	1.35	9.21	9.36	0.01	0.15	0.52	0.67	0.04	0.48	0.53
Coating										
Off-Gas	58.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off Road Diesel	0.27	1.84	1.84	0.00	0.00	0.13	0.13	0.00	0.13	0.13
Worker Trips	0.06	0.04	0.46	0.00	0.15	0.00	0.15	0.04	0.00	0.04
Coating Totals	58.51	1.88	2.30	0.00	0.15	0.13	0.28	0.04	0.13	0.19
Totals	**65.49**	**63.85**	**41.49**	**0.06**			**6.2**			**4.35**
Daily Threshold	75	100	550	150	→	→	150	→	→	55
Exceeds Threshold?	No	No	No	No	→	→	No	→	→	No
Notes: 1. The CalEEMod model projects summer and winter emissions and the higher of the two values is included herein.										

Source: Environmental Impact Sciences

Operational Emissions. Long-term air emission impacts are those impacts associated with any change in permanent use of the project site by on-site stationary and off-site mobile sources that increase emissions. Stationary-source emissions include emissions associated with electricity consumption and natural gas usage. Mobile-source emissions result from vehicle trips associated with a project.

Based on the traffic analysis included in the Transportation/Traffic section of this IS/MND, the proposed Project would generate 1,037 Average Daily Trips (ADT) during project operations. Long-term operational emissions associated with the proposed Project are shown in Table 3. As indicated, the project's operational increase of all criteria pollutants would not exceed the corresponding SCAQMD daily emission thresholds for any criteria pollutants. Therefore, project-related long-term air quality impacts would be less than significant, and no mitigation would be required.

TABLE 3
COMPARISON OF PROJECTED DAILY OPERATIONAL EMISSIONS AND DAILY CRITERIA VALUES
(pounds/day)

Emissions Source	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Proposed Hotel Daily Operational Emissions						
Mobile Sources	1.55	6.01	18.06	0.06	5.31	1.46
Natural Gas	0.06	0.58	0.49	0.00	0.04	0.04
Structural Maintenance	0.16	0.00	0.00	0.00	0.00	0.00
Consumer Products	1.24	0.00	0.00	0.00	0.00	0.00
Landscape Maintenance	0.00	0.00	0.01	0.00	0.00	0.00
Total Hotel Daily Operational Emissions	3.01	6.59	18.56	0.06	5.35	1.50
Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Former Automobile Dealership Daily Emissions	(1.54)	(3.99)	(10.33)	(0.03)	(2.60)	(0.72)
"Net" Daily Operational Emissions	1.47	2.60	8.23	0.03	2.75	0.78
Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Notes: 1. The CalEEMod model projects summer and winter emissions. These can differ for mobile sources and the higher of the two values were included herein.						

Source: Environmental Impact Sciences

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less-than-Significant Impact. The South Coast Air Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the State PM_{10} standard, and in attainment/maintenance for the federal PM_{10}, CO, and NO_2 standards. As discussed in Response 3.3(b) above, no exceedance of SCAQMD criteria pollutant emission thresholds would be anticipated for construction and operation of the proposed Project. The projected emissions of criteria pollutants as a result of the proposed Project are expected to be below the emissions thresholds established for the region. Therefore, there would be no cumulatively considerable net increase of the criteria pollutants that are in nonattainment status in the Basin. No mitigation would be required.

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

Less-than-Significant Impact. In addition to the mass daily threshold standards discussed above, project construction has the potential to raise localized ambient pollutant concentrations. This could present a significant air quality impact if these concentrations were to exceed the ambient air quality standards at receptor locations.

SCAQMD has issued guidance on applying CalEEMod results to localized impacts analyses.[2] Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. The project site is primarily surrounded by heavy commercial uses, with residential uses to the north and north east and the Santiago High School's athletic fields to the south and south east.

Allowable emissions are based on the source receptor area (SRA) in which they are produced. In this case, the project site lies within SRA 17 (Central Orange County). Screening levels for a 1-acre site for CO and NOx with receptors located at a distance of 25 meters are 485 and 81 pounds per day, respectively. At peak values of 7.49 and 19.48 pounds per day for CO and NOx, respectively, these construction emissions would not create significant localized impacts.

Because the Basin is a nonattainment area for particulate matter, the thresholds for both PM10 and PM2.5 are much more stringent than those for CO and NOx. In these cases, the screening tables show allowable values of 4 and 3 pounds per day, respectively, for a 1-acre site with receptors at a distance of 25 meters. At peak values of 2.06 and 1.41 pounds per day for PM10 or PM2.5, respectively, these construction emissions would not create significant localized impacts.

The project's on-site emissions would be below the SCAQMD's LSTs for construction and operations. Therefore, sensitive receptors would not be expected to be exposed to substantial pollutant concentrations during construction and operation of the proposed Project, and potential short-term impacts would be considered less than significant. No mitigation would be required.

e) Would the project create objectionable odors affecting a substantial number of people?

[2] South Coast Air Quality Management District (SCAQMD). Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/ localized-significance-thresholds/caleemod-guidance.pdf (accessed April 2018).

Less-than-Significant Impact.

Operation. SCAQMD's *CEQA Air Quality Handbook* (1993) identifies various secondary significance criteria related to odorous air contaminants. Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills, or heavy manufacturing uses. Pursuant to SCAQMD Rule 402, these sources shall include a quantitative assessment of potential odors and meteorological conditions. The proposed Project does not propose any such uses or activities that would result in potentially significant odor impacts.

Construction. Some objectionable odors may emanate from the operation of diesel-powered construction equipment during construction of the proposed Project. However, these odors would be limited to the construction period which is scheduled to last only 226 days, and would disperse quickly; therefore, these odors would not be considered a significant impact.

Therefore, no significant impacts related to objectionable odors would result from the proposed Project, and no mitigation would be required.

4. Biological Resources

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS?	☐	☐	☐	☒
b) Have a substantial adverse effect on any sensitive riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally-protected or wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, 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 local, regional, or State habitat conservation plan?	☐	☐	☐	☒

Background Information

Figure 15 (Generalized Wildlife Habitat Areas [2005]), as extracted from the "Resources Element" (Figure VI-4) of the County's "Orange County General Plan" (2005) provides a generalized depiction of wildlife habitat areas throughout the County. As noted therein, no "wildlife habitat areas" are depicted in the general area of the project site. As further indicated in the "Final Program Environmental Impact Report – City of Garden Grove General Plan, SCH No. 2008041079" (2008 FPEIR), as certified by the Council on August 26, 2008, with regard to programmatic impacts upon biological resources, the implementation of the GGGP would have no significant impact on biological resources, including any protected species.

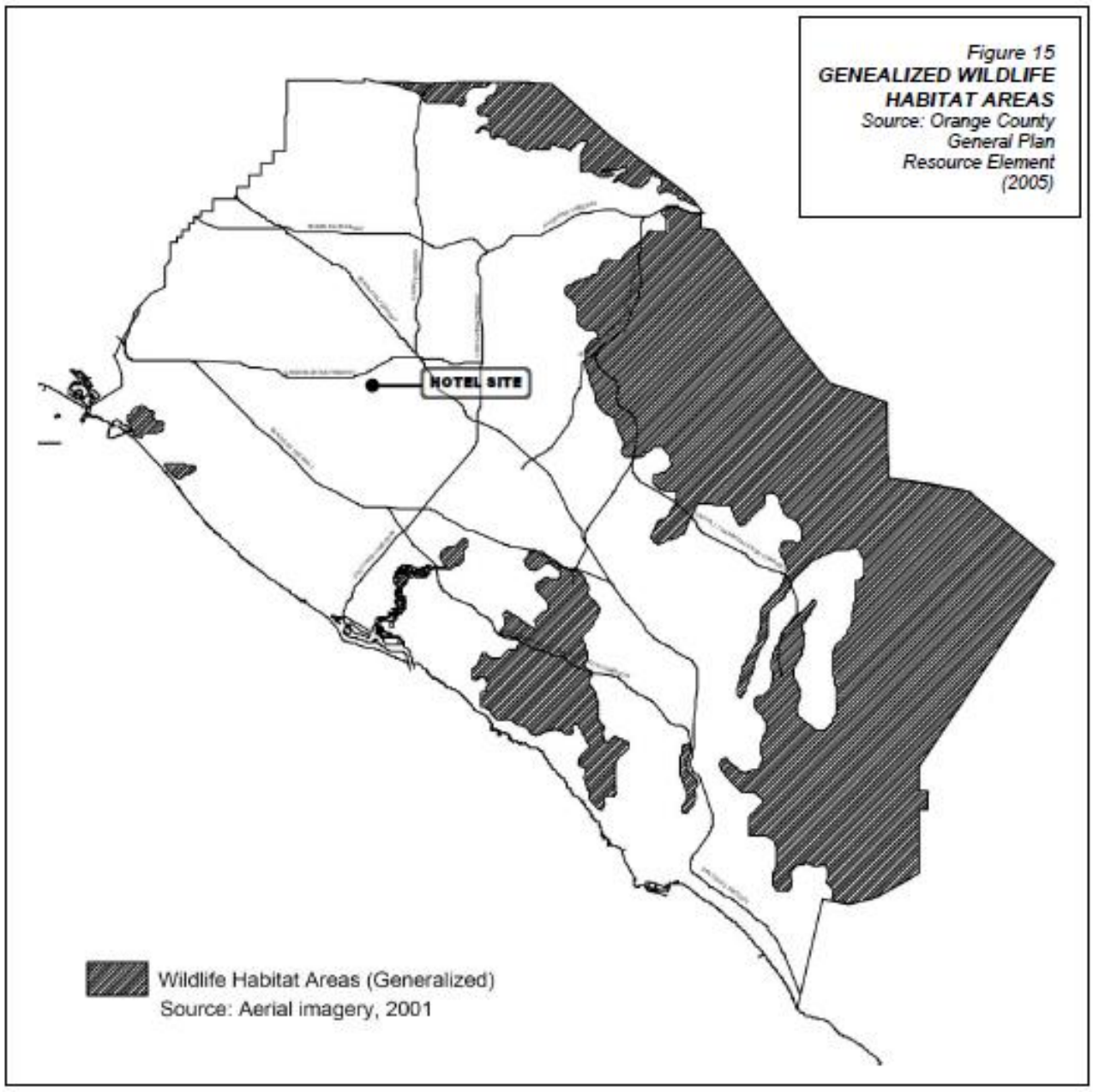


Figure 15
GENEALIZED WILDLIFE HABITAT AREAS
Source: Orange County General Plan Resource Element (2005)
HOTEL SITE
Wildlife Habitat Areas (Generalized)
Source: Aerial imagery, 2001

Waters of the United States

The Environmental Protection Agency (USEPA) has clarified, in the waters of the United States rulemaking, that concrete-lined channels constructed in dry lands or uplands are not "waters of the United States." (Clean Water Rule: Definition of "Waters of the United States": Final Rule, 80 Federal Register 124 [June 29, 2015], pp. 37053-37127). The Orange County Flood Control District's (OCFCD) East Garden Grove-Wintersburg Channel (CO5) (EGGWC) is an unvegetated, concrete-lined flood control channel located entirely outside the boundaries of the proposed hotel project. As specified in Part 328, Section 828.3(b)(6) of the Clean Water Rule, "[s]tormwater control features constructed to convey, treat, or store stormwater that are created in dry land" excluded from the definition of "waters of the United States."

Conversely, the EGGWC is identified as an intermittent blue-line drainage on the Anaheim 7.5-minute quadrangle (2015). The channel is a constructed drainage that contains an "ordinary high water mark" (OHWM), constitutes a relatively permanent water, and is tributary to a traditional navigable water (Bolsa Bay). As a result, the EGGWC may be subject to USACE jurisdiction pursuant to Section 404 of the federal Clean Water Act. Only the USACE can determine the channel's final jurisdictional status.

The proposed Project, however, does not propose any activities that would include or otherwise impact the EGGWC. As a result, the channel's jurisdictional status would not be expected to affect the approval, construction, or operation of the proposed Project nor impose additional entitlement obligations on the project.

Findings of Fact

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS).

No Impact. The project site is located in a built-out, urban area within the City. As shown in Figure 1 (13624-13650 Harbor Boulevard – Former Garden Grove Mazda and Harbor Auto Center [2017]), only limited vegetation presently exists at the project site. With the possible exception of invasive species, the project site is absent of both native and ornamental vegetation, including trees that might host nesting birds. Due to the lack of suitable habitat, the project site lacks the ability to support any candidate, sensitive, or special status species. In addition, the United States Fish & Wildlife Service *Threatened & Endangered Species Active Critical Habitat Report* (Environmental Conservation Online System [ECOS]) does not identify any locations of critical habitat on or in proximity to the project site. Therefore, no impacts to sensitive or special-status species would result from project implementation.

b) Would the project have a substantial adverse effect on any sensitive riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

No Impact. The project site is located in a built-out, urban area within the City. As shown in Figure 1 (13624-13650 Harbor Boulevard – Former Garden Grove Mazda and Harbor Auto Center [2017]), no sensitive natural communities exist on the project site. In addition, the United States Fish & Wildlife Service Threatened & Endangered Species Active Critical Habitat Report (Environmental Conservation Online System [ECOS]) does not identify any locations of critical habitat on or in proximity to the project site. Therefore, no impacts related

to riparian habitat or other sensitive natural communities identified in local or regional plans would result from project implementation.

c) Would the project have a substantial adverse effect on federally-protected or wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The proposed Project site was previously developed and is located in an urban area within the City. As shown in Figure 1 (13624-13650 Harbor Boulevard – Former Garden Grove Mazda and Harbor Auto Center [2017]), the project site was previously graded, and does not contain any natural hydrologic features or federally or State-protected wetlands. Therefore, implementation of the proposed Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pools, and coastal) through direct removal, filling, hydrological interruption, or other means.

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. The proposed Project site was previously developed and is located in an urban area within the City. As shown in Figure 1 (13624-13650 Harbor Boulevard – Former Garden Grove Mazda and Harbor Auto Center [2017]), the project site was previously graded, and does not contain any significant habitat value. There is no established native resident or migratory wildlife corridor existing within or adjacent to the project site. Therefore, the proposed Project will not have a substantial adverse effect on any native resident or migratory fish, wildlife species, or wildlife corridors.

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

No Impact. Chapter 11.32 of the Garden Grove Municipal Code regulates the care and removal of trees on public property. The proposed Project does not call for the removal, cutting, pruning, breaking, injuring, or planting of any trees in the public right-of-way. Therefore, the proposed Project would not conflict with the City's Municipal Code, and therefore would not result in a significant impact related to conflicts with local policies or ordinances protecting biological resources.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or State habitat conservation plan?

No Impact. As stated previously, the project site was previously developed and is located in an urban area within the City. There are no State, regional, or local habitat conservation plans that include the project site. Specifically, the City is not located within the boundaries of the Orange County Central/Coastal Natural Community Conservation Plan/Habitat Conservation Plan. Therefore, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan.

5. Cultural Resources

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 in Title 14 of the CCR?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant Section 15064.5 in Title 14 of the CCR?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Background Information

CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5[a]).

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

Figure 16 (Prehistoric Archaeology – General Areas of Sensitivity [2005]), as extracted from the "Resources Element" (Figure VI-10) of the County's "Orange County General Plan" (2005), provides a generalized depiction of those "general areas of sensitivity" located throughout the County. As noted therein, neither the project site nor the general project area are depicted as a potential archaeological resource area. Additionally, with regard to the likely presence of paleontological resources, Figure 17 (Paleontology – General Areas of Sensitivity [2005]), as extracted from the "Resources Element" (Figure VI-13) of the County's "Orange County General Plan" (2005), provides a generalized depiction of those "general areas of sensitivity" located throughout the County. As noted therein, neither the project site nor the general project area are depicted as a potential paleontological resource area.

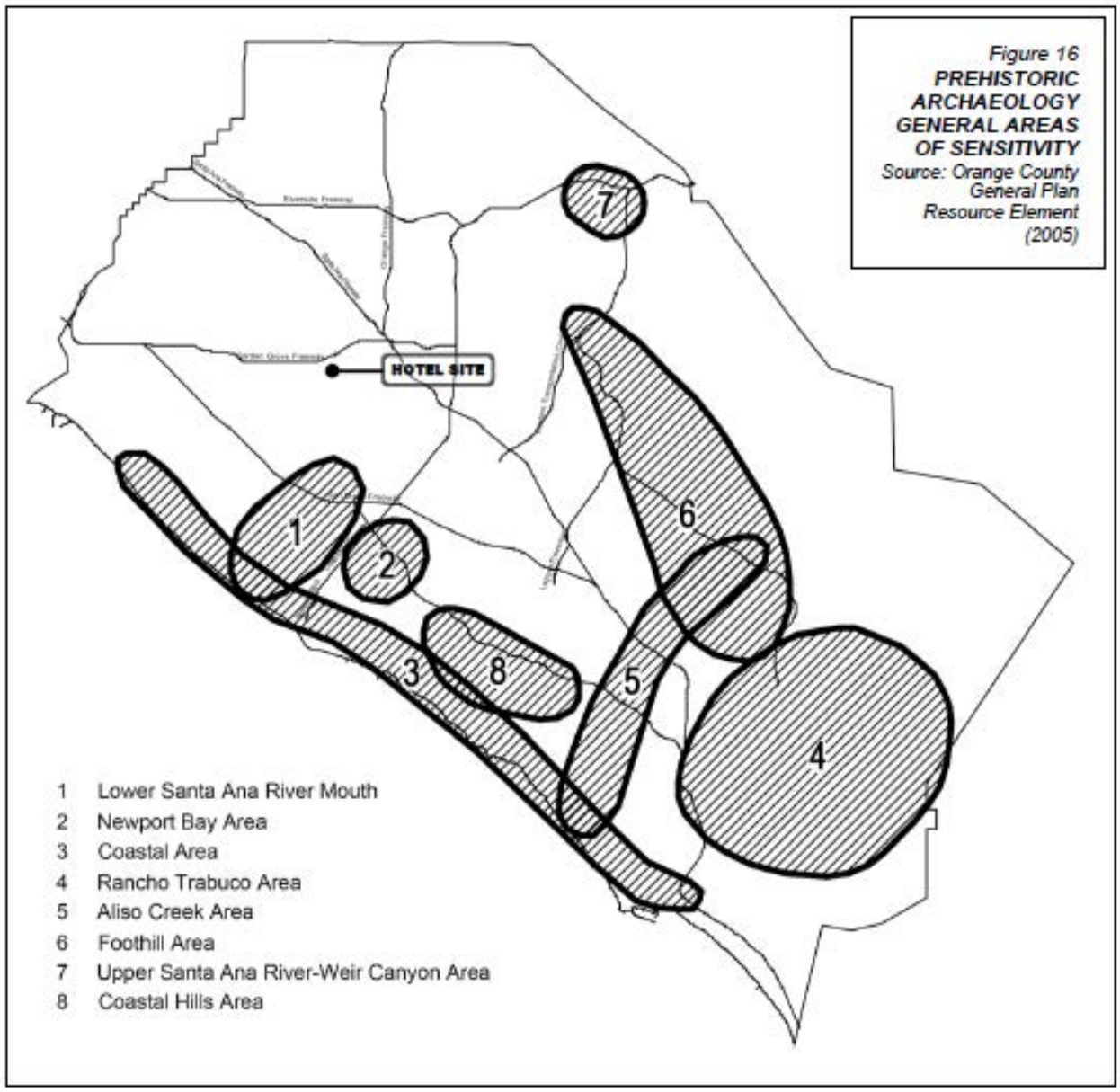


Figure 16
PREHISTORIC ARCHAEOLOGY GENERAL AREAS OF SENSITIVITY
Source: Orange County General Plan Resource Element (2005)
HOTEL SITE
1
2
3
4
5
6
7
8
1 Lower Santa Ana River Mouth
2 Newport Bay Area
3 Coastal Area
4 Rancho Trabuco Area
5 Aliso Creek Area
6 Foothill Area
7 Upper Santa Ana River-Weir Canyon Area
8 Coastal Hills Area

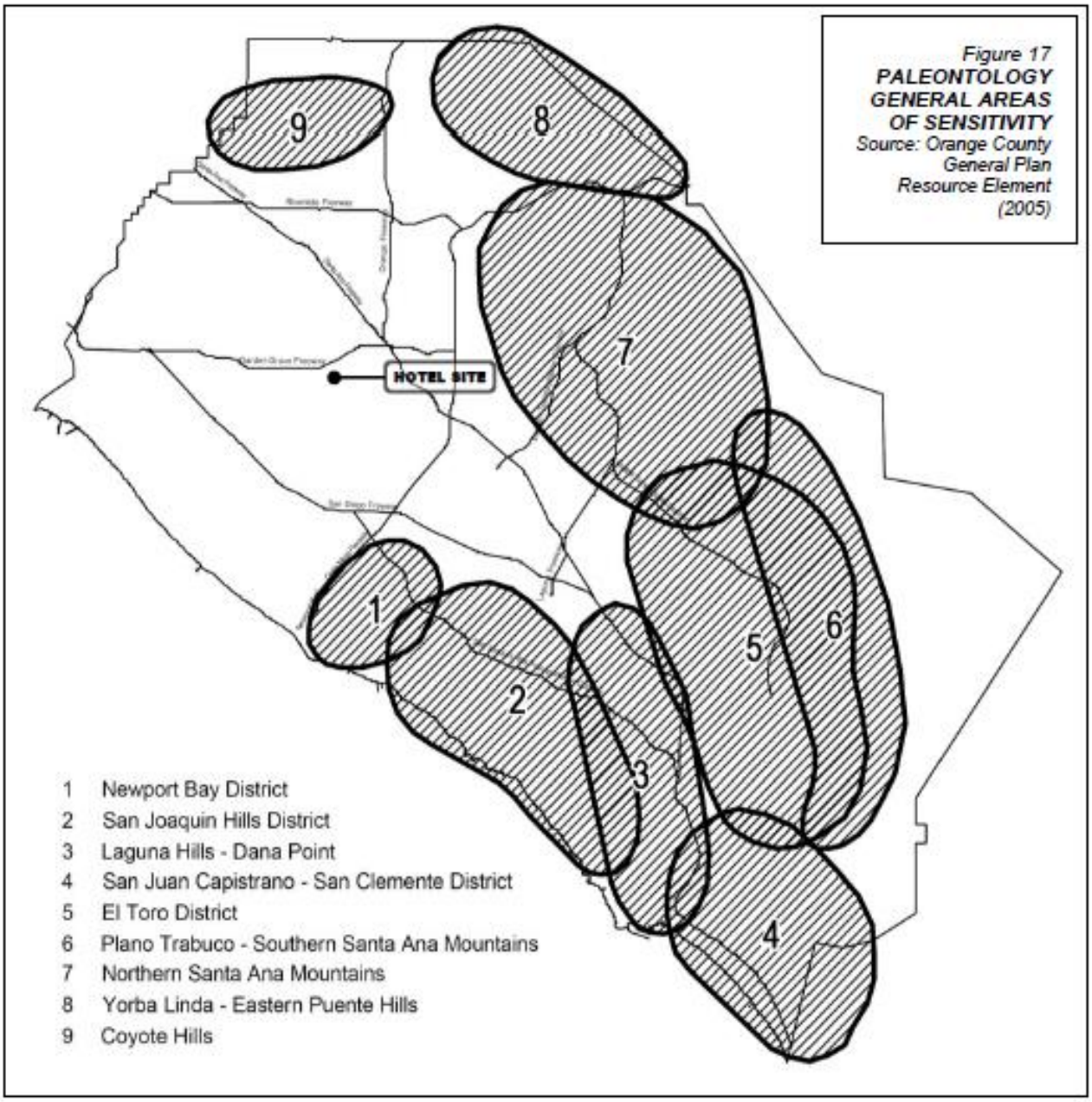


Figure 17
PALEONTOLOGY
GENERAL AREAS
OF SENSITIVITY
Source: Orange County
General Plan
Resource Element
(2005)
HOTEL SITE
1 Newport Bay District
2 San Joaquin Hills District
3 Laguna Hills - Dana Point
4 San Juan Capistrano - San Clemente District
5 El Toro District
6 Plano Trabuco - Southern Santa Ana Mountains
7 Northern Santa Ana Mountains
8 Yorba Linda - Eastern Puente Hills
9 Coyote Hills

Findings of Fact

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 in Title 14 of the CCR?

No Impact. According to the City's General Plan Conservation Element (2008), the City contains three structures (the Stanley or Ware House within Heritage Park, the Harry A. Lake House, and the Reyburn House) that are candidates for nomination to the National Register. However, according to the National Register[3] and the California Register,[4] there are no documented historic resources on or within the vicinity of the project site.

All prior improvements located on the project site have been removed and the site is ready for development. Through those activities, any historic features and identity, if any, that may have once existed on the project site have been removed and any relationship to prior events associated with the City or the region have been eliminated. A physical inspection of the property reveals no evidence of the potential presence of any historic features, artifacts, or other resources thereupon.

Because there are no local, State, or federal historic resources on or adjacent to the project site, implementation of the proposed Project would result in no impacts with respect to historic resources, as defined by Section 15064. No mitigation would be required.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant Section 15064.5 in Title 14 of the CCR?

Less Than Significant With Mitigation Incorporated. The project site has been previously disturbed and significantly altered as a result of past construction activities on the site. Although the East Garden Grove-Wintersburg Channel is an unvegetated, concrete-lined drainage facility, USGS maps continue to depict a "blue-line stream" adjacent to the proposed hotel site. The continuing depiction of that "blue-line stream" suggests that the channel historically replaced a naturally-occurring watercourse of unknown characteristics that existing adjacent or proximal to the project site and supporting associated riparian vegetation and habitats. The existing channel, is presently highly disturbed and no remaining evidence of any such past resources are present.

There is no indication that the project site presently has or once may have contained any archaeological resources. Any archaeological resources that may have once existed on and near the project site would have been eliminated and removed as a result of the area's former agricultural and commercial uses, and by more recent construction activities. A physical inspection of the property reveals no evidence of the potential presence of any archaeological or historic features, artifacts, or other associated resources thereupon.

Although there is little potential for the proposed Project to impact prehistoric resources due to significant prior disturbance from past grading and development activities, project construction would require grading and excavation activities that may extend into native soils. Therefore, Mitigation Measure CUL-1 outlines procedures to be followed in the unlikely event unknown archaeological resources are discovered at any time during grading and

[3] United States Department of the Interior, National Register of Historic Places. Website: https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466 (accessed April 3, 2018).
[4] Office of Historic Preservation, California Historical Resources. Website: http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=30 (accessed April 3, 2018).

construction activities. In accordance with Mitigation Measure CUL-1, work in the area would be halted and deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. More specifically, in the event that archaeological materials are encountered during construction, work in the vicinity of the find should be halted until the find can be assessed for significance by a qualified archaeologist to determine the appropriate treatment and documentation of the discovery (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f). Compliance with existing regulations (as required by Mitigation Measure CUL-1), would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

Mitigation Measure:

CUL-1 Unknown Archaeological Resources. In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code. Construction personnel shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code Section 21083.2.

Prior to commencement of grading activities, the City of Garden Grove Community and Economic Development Department, or designee, shall verify that all project grading and construction plans include specific requirements regarding California Public Resources Code Section 21083.2 and the treatment of archaeological resources as specified above.

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

Less-than-Significant With Mitigation Incorporated*.* The project site is located in the USGS' "Anaheim 7.5-minute Quadrangle." As indicated in the California Department of Conservation's "Seismic Hazard Zone Report for the Anaheim and Newport Beach 7.5-Minute Quadrangles, Orange County, California, Seismic Hazard Zone Report 03" (1997), the quadrangle is bounded on the north by the inferred trace of the Norwalk Fault Zone and the late Pleistocene fan deposits associated with the adjacent anticlinal hills of the Coyote Hills Uplift. The main body of the quadrangle is underlain by the broad, northwest-plunging synclinal Los Angeles Basin, which includes up to 4,200 feet of relatively unconsolidated Pleistocene marine and non-marine sediments and up to 170 feet of unconsolidated non-marine sediments.

With regard to the potential presence of any vertebrate fossil localities within the general project area, the Natural History Museum of Los Angeles County (Vertebrate Paleontology Section) has reported that the area's surficial sediments consist of younger terrestrial Quaternary Alluvium, derived either as fan deposits from the hills to the northwest or as fluvial deposits from the floodplain of the Santa Ana River, with older terrestrial Quaternary sediments occurring at various depths. The younger Quaternary deposits typically do not

contain significant vertebrate fossils, at least in the uppermost layers. A vertebrate fossil locality (LACM 1652) was uncovered on the western side of the Santa Ana River (along Rio Vista Avenue and south of Lincoln Avenue) that produced a fossil specimen of sheep (Ovis). The closest fossil locality in older Quaternary sediment (LACM 4943) was uncovered on the east side of the Santa Ana River (along Fletcher Avenue and east of Glassell Street) that produced a specimen of a fossil horse (Equus) at a depth of 8-10 feet below the surface.

Surface grading or shallow excavation in the upper few feet of the younger Quaternary alluvial sediments are unlikely to uncover significant fossil vertebrate remains. Deeper excavation may encounter vertebrate fossils in older Quaternary sediments. No excavation activities to depths sufficient to encounter older Quaternary sediments are proposed as a part of the proposed Project.

In the unlikely event that fossil remains are encountered on the site, Mitigation Measure CUL-2 requires that a paleontologist be contacted to assess the discovery for scientific significance and to make recommendations regarding the necessity to develop paleontological mitigation (including paleontological monitoring, collection, stabilization, and identification of observed resources; curation of resources into a museum repository; and preparation of a monitoring report of findings). With implementation of Mitigation Measure CUL-2, impacts to paleontological resources would be reduced to a less than significant level.

> **CUL-2 Unknown Paleontological Resources.** In the event that paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet (ft) of the find until a qualified paleontologist (i.e., a practicing paleontologist that is recognized in the paleontological community and is proficient in vertebrate paleontology) has evaluated the find in accordance with federal, State, and local guidelines. Construction personnel shall not collect or move any paleontological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. If any fossil remains are discovered prior to commencement of grading activities, the Director of the City Community and Economic Development Department, or designee, shall verify that all project grading and construction plans specify federal, State, and local requirements related to the unanticipated discovery of paleontological resources as stated above.

d) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less-than-Significant Impact*.* Due to the past disturbance and development of the entire site, no known human remains are present on the project site, and there are no facts or evidence to support the idea that human remains are buried on the project site.

If human remains are encountered during excavations, all work will halt and the County Coroner (Coroner) will be notified (Public Resources Code § 5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner determines that the remains are prehistoric, the Coroner will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code (H&SC). The MLD will make recommendations within 24 hours of notification by the NAHC. This recommendation may include scientific removal and nondestructive analysis of human remains and items

associated with Native American burials (Health & Safety Code § 7050.5). With compliance with the applicable law, potential project impacts would be less than significant. No mitigation would be required.

6. Geology and Soils

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace?	☐	☐	☐	☒
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 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 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?	☐	☐	☐	☒

Background Information

In accordance with City requirements, a Preliminary Geotechnical Investigation was conducted to assess the feasibility of the proposed development. The resulting "Preliminary Geotechnical Investigation Report Including Percolation Testing, Proposed 5-Story Hotel, 13650 South Harbor Blvd., Garden Grove, California" (July 26, 2017) (Preliminary Geotechnical Investigation) is included in Appendix D (Preliminary Geotechnical Investigation). As indicated therein: "Based on

our investigation the proposed development is feasible from a geotechnical viewpoint provided the recommendations presented in this report are implemented during design and construction."

Earthquake Zones of Required Investigation

Following the 1971 San Fernando earthquake, the State Legislature passed the Alquist-Priolo Earthquake Fault Zoning Act (APEFZA), codified in Section 2621 et seq. in Chapter 7.5 of Division 2 of the Public Resources Code. The APEFZA was adopted to "provide policies and criteria to assist cities, counties, and State agencies in the exercise of their responsibilities to prohibit the location of developments and structures for human occupancy across the trace of active faults." As defined, an "active fault" is one along which surface displacement has occurred within Holocene time (during the past 11,000 years). A "fault trace" is a line formed by the intersection of a fault and the earth's surface.

With certain exceptions, the APEFZA prohibits the construction of structures for human occupancy across the trace of an active fault or within 50 feet of an active fault, and prohibits the construction of an addition or alteration to a structure already existing on the trace of an active fault if the value of the addition or alteration exceeds 50 percent of the value of the structure. The law requires the State Geologist establish regulatory zones (known as "earthquake fault zones") around the surface traces of active faults and to issue maps illustrating the location of those earthquake fault zones. With regard to the APEFZA, since no corresponding maps have been prepared for the Anaheim 7.5-minute quadrangle, it can be presumed that no earthquake fault zones have been identified therein.

Presented in Figure 18 (Major Earthquake Fault Map in the Vicinity of the Anaheim Quadrangle [2006]) is a portion of the "Geologic Map of the San Bernardino and Santa Ana 30'x60' Quadrangles, California" (Morton, D.M. and Miller, F.D, United States Geologic Survey Open-File Report 2006-1217, Version 1, 2006, Sheet 2) depicting known earthquake faults in the general project area. Two fault splays associated with the inactive Pelican Hills fault zone traverse the central and western portions of the City in a northwest-to-southeast trending direction. The northwest-trending Pelican Hills fault zone was evidently active between early Miocene and late Pliocene time; its movement may include lateral separation similar to that of the nearly Newport-Inglewood zone.

Prompted by damaging earthquakes in 1990, the State Legislature passed the Seismic Hazards Mapping Act (SHMA), as codified in Sections 2690-2699.6 in Chapter 7.8 of the Public Resources Code, for the purpose of protecting the public from the effects of strong ground shaking, liquefaction, landslides or other ground failure, and other hazards caused by earthquakes. As required therein, the California Division of Mines and Geology, now the California Geological Survey (CGS), was directed to delineate the various "seismic hazard zones" located throughout the State. The State's minimum criteria for projects within "zones of required investigation" are defined in Title 14, California Code of Regulations, Section 3724. As indicated, in part, therein, a project shall be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate mitigation measures have been proposed.

The CGS "Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication No. 117A" (2008) provide guidelines for evaluating and mitigating seismic hazards, other than surface fault rupture, and for recommending mitigation measures as required under Section 2695(a) of the Public Resources Code. As defined in Section 2693(c), "mitigation" means "those measures that are consistent with established practice and that will reduce seismic risk to

acceptable levels." As defined in Section 3721(a) of Title 14 of the California Code of Regulations, "acceptable level" means that level that provides reasonable protection of the public safety, though it does not necessarily ensure continued structural integrity and functionality of the project."

As prepared by the CGS, Figure 19 Earthquake Zones of Required Investigation – Anaheim Quadrangle [April 15, 1998], shows the location of Seismic Hazard Zones, referred to as "earthquake zones of required investigation." These zones are intended to assist cities and counties in fulfilling their responsibilities for protecting the public from the effects of earthquake-triggered ground failure, as required by the SHMA.

Findings of Fact

ai) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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 active fault trace?

No Impact*.* There are no known active or potentially active faults or fault traces crossing the Anaheim 7.5-minute quadrangle. The proposed Project is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. Therefore, no impacts with respect to exposing people or structures to ruptures of known earthquake faults would occur.

aii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less-than-Significant Impact*.* As with all of Southern California, the Project site is subject to strong ground motion resulting from earthquakes on nearby faults. The site, the City, and the region will be exposed to strong ground shaking over the life of the project.

As indicated in the California Department of Conservation, Division of Mines and Geology's (now the California Geological Survey) "Seismic Hazard Zone Report for the Anaheim and Newport Beach 7.5-Minute Quadrangles, Orange County, California, Seismic Hazard Zone Report 03" (1997) indicates that the "predominant earthquake" affecting the project size is of moment magnitude 6.7 Mw at a distance of about 7 kilometers (4.35 miles), 10 percent exceedance in 59-years peak-ground acceleration.

The 2016 "California Building Code" (2016 CBC), codified in Part 2 in Title 24 of the CCR, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength and general building stability by regulating and controlling the design, construction, quality of materials, use, occupancy, location, and maintenance of buildings and structures. The 2016 CBC contains necessary amendments based on the American Society of Civil Engineers (ASCE) "Minimum Design Standards 7.05." ASCE 7.05 provides requirements for general structural design and includes means for determining earthquake loads. These earthquake design requirements take into account the occupancy category, site class, soil classifications, and various seismic coefficients to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motion at a given site. Design specifications are then determined according to the SDC.

As indicated in Section 1613A (Earthquake Loads) in Chapter 16A (Structural Design) of Division IV of the 2016 CGS: "Every structure, and portion thereof, including nonstructural components attached to structures and their supports and attachments, shall be designed and constructed to resist the effects of ground motions in accordance with ASCE 7 with all the modifications incorporated herein […] The seismic design category for structures shall be determined with Section 1613A." As a result, sufficient design standards exist to ensure that the proposed hotel project will be designed and constructed in recognition of the anticipated occurrence of ground motion. With implementation of these design standards, potential project impacts related to seismic ground shaking would be less than significant. No mitigation would be required.

aiii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less-than-Significant Impact*.* As noted in in "Seismic Hazard Zone Report 03" (1997): "Localities most susceptible to liquefaction-induced damage are underlain by loose, water-saturated, granular sediment within 40 feet of the ground surface. These geological and ground-water conditions exist in parts of southern California, most notably in some densely populated valley regions and alluviated floodplains. In addition, the potential for strong earthquake ground shaking is high because of the many nearby active faults. The combination of these factors constitutes a significant seismic hazard in the southern California region in general, including areas in the Anaheim and Newport Beach quadrangles."

As indicted in Figure 19 (Earthquake Zones of Required Investigation – Anaheim Quadrangle [April 15, 1998]), the Project site is subject to potential liquefaction hazards. The liquefaction and settlement potential of the site was evaluated as part of the Geotechnical Investigation prepared for the proposed Project. The Project's Preliminary Geotechnical Investigation noted that "[a] review of the seismic hazard report for the Anaheim quadrangle indicates that the historic high groundwater at the subject site is approximately 8 feet below existing ground surface […] Due to the presence of loose sandy soils below the historic high-water table, the potential for liquefaction at the subject site is high."

In recognition of that hazard, a liquefaction analysis was presented in the Preliminary Geotechnical Investigation. Based on that analysis, the report presented specific design recommendations. Due to excessive liquefaction-induced seismic settlement ground improvement, utilizing deep soil cement mixing or stone columns were recommended to reduce the future liquefaction-induced settlement.

As a standard condition, the City will require that all design and development recommendations presented in the Preliminary Geotechnical Investigation are implemented as conditions of project approval. With implementation of these design and development standards, potential project impacts related to seismic-related ground failure, including liquefaction and settlement, would be reduced to a less than significant level. No mitigation would be required.

aiv) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact*.* The project site is relatively flat. There are no substantial hillsides or unstable slopes immediately adjacent to the site boundary. Moreover, the project site is not located

within a zone of potential earthquake-induced landslide hazards based on the California Department of Conservation, Division of Mines and Geology (now the California Geological Survey) "State of California Seismic Hazard Zones – Anaheim Quadrangle" (April 15, 1998) (Figure 19).

Additionally, as depicted in Figure 20 (Preliminary Soil-Slip Susceptibility Map [2003]) and as described in the CGS' "Preliminary Soil-Slip Susceptibility Map, Southwestern California" (2003), the general project area is not susceptible to rainfall-triggered soil-slip debris flows. Debris flows are a common and widespread phenomenon during periods of intense winter rainfall in southern California. The news media commonly uses 'mudslides' to refer to these and many other kinds of landslides. Most debris flows occur during winters with above normal rainfall. These debris flows originate as small, shallow landslides, commonly referred to as soil slips. Most soil slips initiate as debris slide blocks with a form of an elliptical-shaped slab. Debris slide blocks are a form of translational slides in the Varnes landslide classification. Most soil slips disaggregate into debris flows, fluid slurries of soil and rock detritus that commonly converge in stream channels, where they flow down channel at various speeds for various distances. Unlike "bedrock" or "deep-seated" landslides that are generally recognizable for long periods of time, commonly thousands of years, soil slip-debris flow scars quickly "absorb" into the ambient physiography leaving little if any record of their prior existence. The most lasting record of the debris flows are deposits that accumulate on fans or as relatively steep ravine or gully fill.

There appears no potential for either a seismically-induced or rain-related landslide at or near the site, therefore, no mitigation is required.

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

No Impact*.* The project site has been previously cleared and all topsoil removed. During construction, the Project Applicant would be required to adhere to the requirements of the General Construction Permit and implement Erosion Control and Sediment Control Best Management Practices (BMPs) which are intended to minimize erosion and retain sediment on site. As a result, no impacts resulting in substantial soil erosion or the loss of topsoil would occur, and no mitigation is required.

c) Would the project be located on a geologic unit or soil that is 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*.* The upper alluvial soils at the project site consist of young, Quaternary age (<1.8 million years old), unconsolidated alluvial fan sediments deposited over a broad gently sloping alluvial plain.

As illustrated in the "Geologic Map of the Santa Ana 30'x60' Quadrangle, Southern California, Version 1.0" (2006), the surficial soils underlying the project site are designated "Qyfa" and consist of alluvial fan material and alluvium deposited by the Santa Ana River over the last few thousand years. These unconsolidated alluvial sediments are generally composed of flat-lying, non-marine deposits of sand and a minor amount of silt.

As indicated in the Preliminary Geotechnical Investigation: "At the subject site, the upper 15 feet of subsurface soils are generally slightly moist to moist, brown, silty sand to sand with varying amounts of sand and silt. At approximately 15 feet below ground surface, a thin layer

of silt to silty sand occurs to approximately 20 feet. The material below this is generally fine to coarse sand with varying amounts of silt in a wet and loose condition to approximately 45 feet below grade. Below this the material becomes silty sand at 45 feet and silt at 50 feet to the maximum depth explored, approximately 51.5 feet below grade. A detailed description of soils encountered is included on the boring logs, Appendix B. The site soils are generally consistent with the young alluvial fan deposits described in the geologic map for the area.

The project's Preliminary Geotechnical Investigation concluded: "Ground accelerations generated from a seismic event can produce settlements in sands or in granular earth materials both above and below the groundwater table. This phenomenon is often referred to as seismic settlement and is most common in relatively clean sands, although it can also occur in other soil materials. The liquefaction induced settlement is estimated to be 8.2 inches. The seismic settlement of dry sand is estimated to be negligible after remedial grading […] Ground improvement comprising of deep soil cement columns or stone columns is recommended to control the seismic settlement."

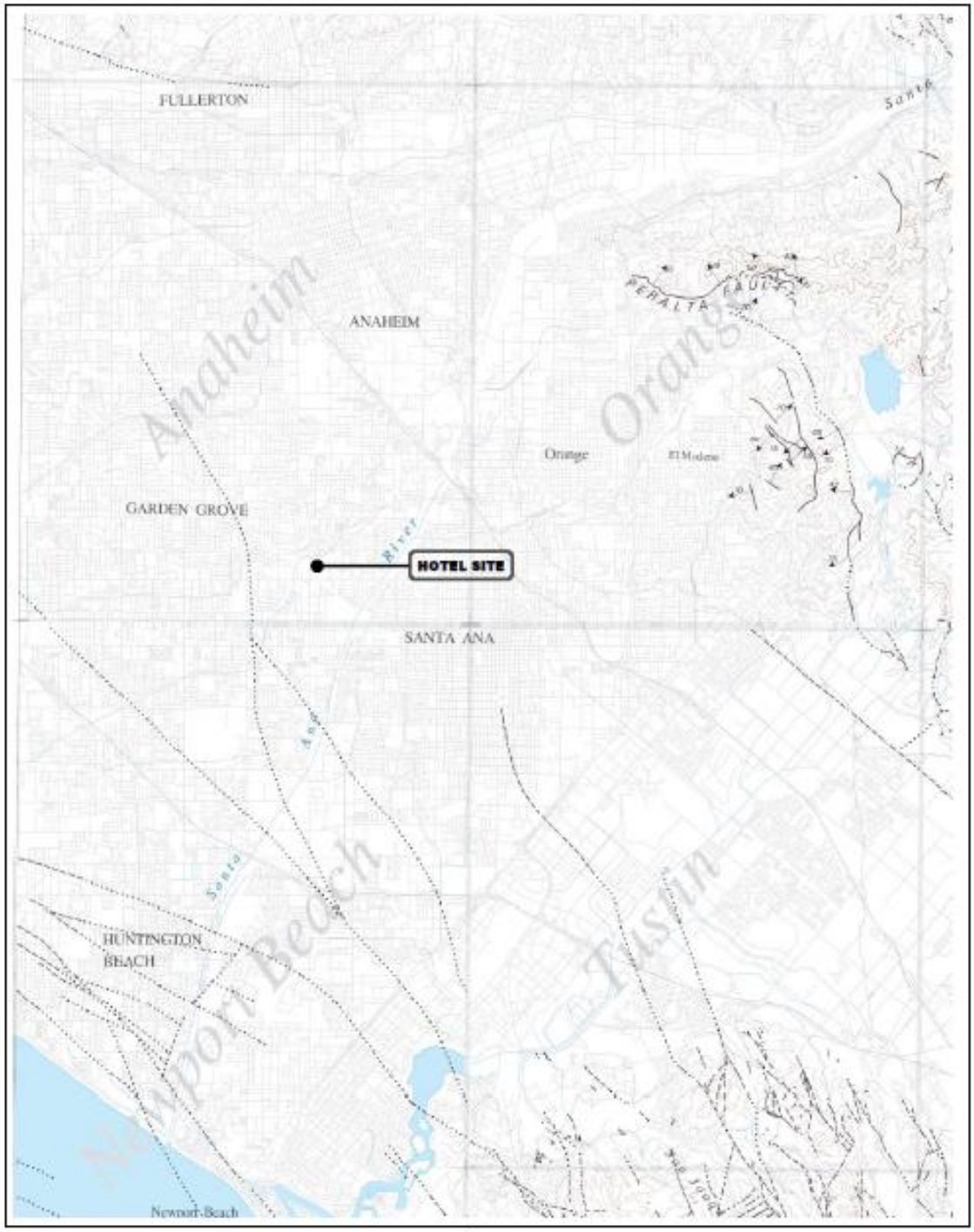
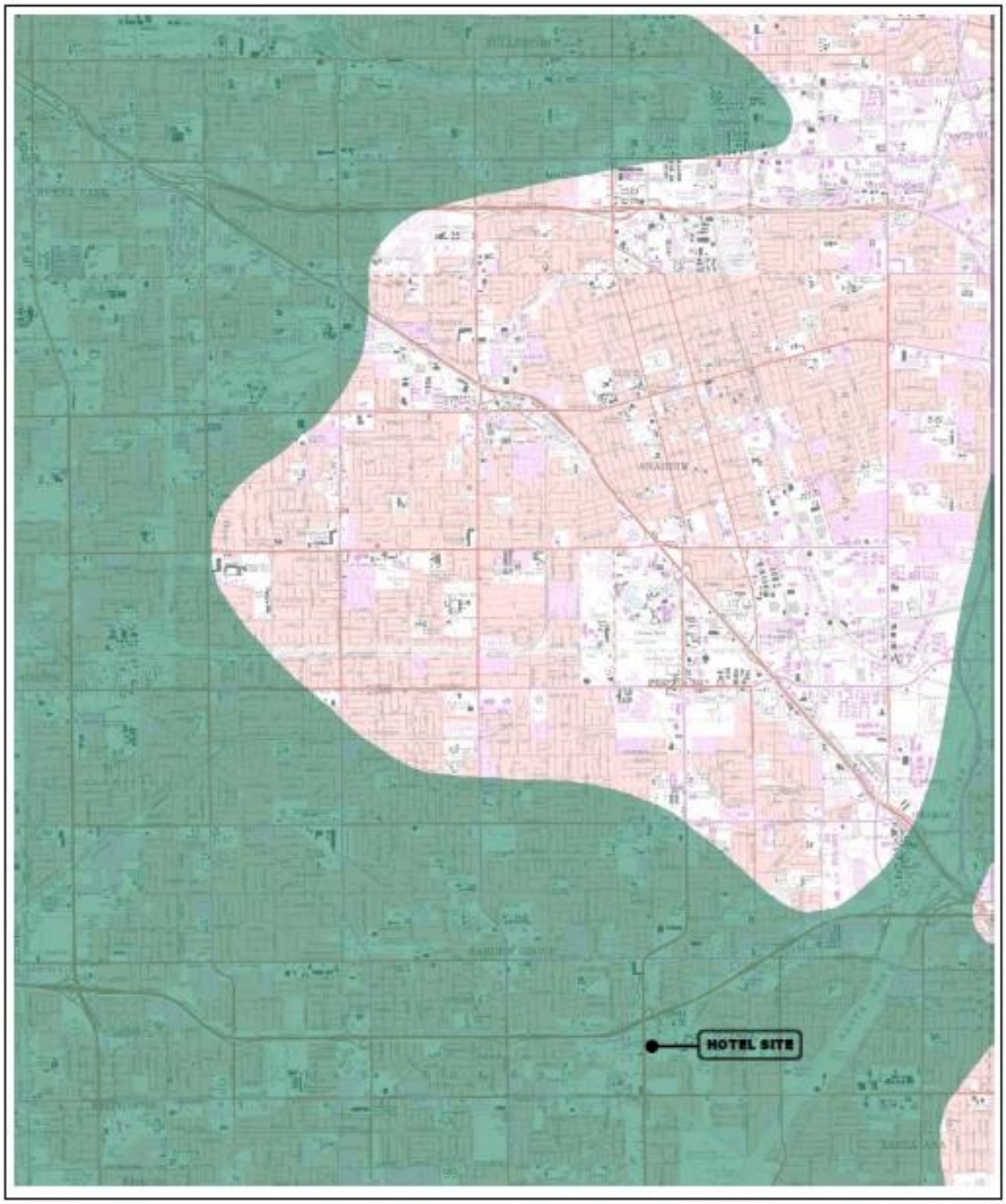


Figure 18
***MAJOR EARTHQUAKE FAULTS IN THE VICINTY OF THE ANAHEIM QUADRANGLE** (2006)*
Source: United States Geologic Survey



MAP EXPLANATION

SEISMIC HAZARD ZONES

Liquefaction Zones
Areas where historical occurrence of liquefaction, or local geological, geotechnical and ground water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Figure 19
EARTHQUAKE ZONES OF REQUIRED INVESTIGATION
ANAHEIM QUADRANGLE
(April 15, 1998)
Source: California Geological Survey

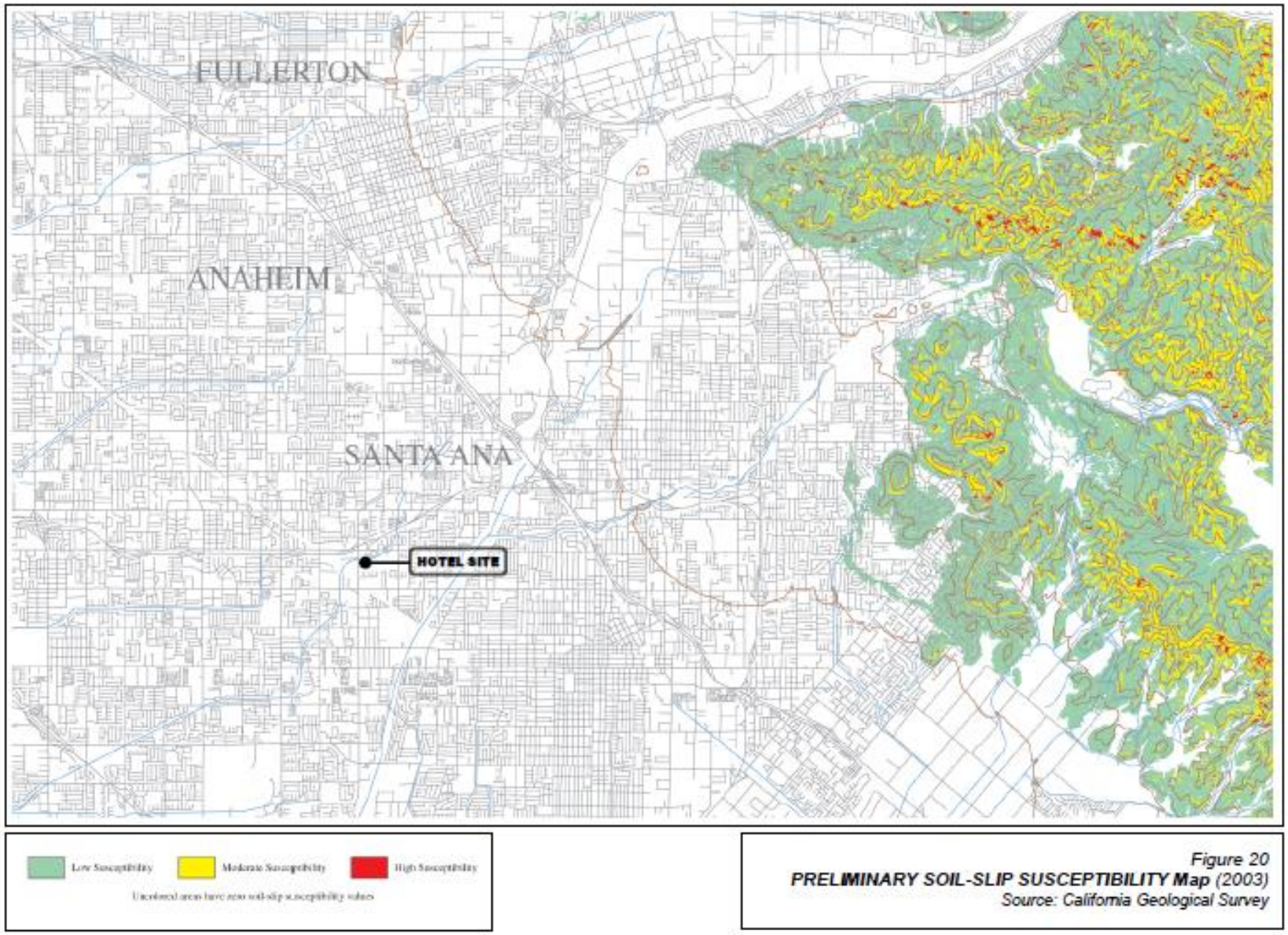


Figure 20
***PRELIMINARY SOIL-SLIP SUSCEPTIBILITY Map** (2003)*
Source: California Geological Survey

As a standard condition, the City will require that all design and development recommendations presented in the Preliminary Geotechnical Investigation are incorporated into the design and operation of the proposed Project and implemented as conditions of the project's approval. Therefore, potential impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapse 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 risks to life or property?

No Impact. Expansive soils are those that contain significant amounts of clays that expand when wetted and can cause damage to foundations if moisture collects beneath structures. Those soils encountered on the project site do not appear to have the characteristics of "expansive soils."

As indicated by the Natural Resources Conservation Service's (NRCS) "Soil Survey of Orange County and Western Part of Riverside County, California" (1978, revised 2017), on-site soils are identified as "Hueneme, fine, sandy loam, drained (158)" (Appendix E). Drained Hueneme fine sandy loam is found in alluvial fans and is created through the degradation of stratified alluvium derived from sedimentary rock. This soil is poorly drained naturally and has moderate water storage capacity. The shrink-swell potential for Hueneme fine sandy loam, drained, is slight. None of the soils on the project area have a high expansion potential or, in compliance with the Uniform Building Code (UBC), would require "special [foundation] design considerations."

Because the project site doesn't appear to have expansive soils, no impacts would occur, and no mitigation is required.

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

No Impact. The proposed Project does not include construction of septic tanks or connections to septic systems or alternative wastewater disposal systems. Therefore, the proposed Project would not result in impacts related to the soils' capability to adequately support the use of septic tanks or alternative wastewater disposal systems, and no mitigation is required.

7. Greenhouse Gas Emissions

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

Background Information

A detailed air quality analysis was performed as part of this CEQA-compliance effort. The resulting "Air Quality Analysis" (April 21, 2018) is included in Appendix B (Air Quality Analysis).

Global climate change (GCC) describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global temperatures are modulated by naturally occurring components in the atmosphere (e.g., water vapor, carbon dioxide [CO_2], methane [CH_4], and nitrous dioxide [N_2O]) that capture heat radiated from the Earth's surface, which in turn warms the atmosphere. This natural phenomenon is known as the "greenhouse effect." That said, excessive human-generated greenhouse gas (GHG)[5] emissions can and are altering the global climate. The principal GHGs of concern contributing to the greenhouse effect are CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is the largest naturally occurring GHG; however, it is not identified as an anthropogenic constituent of concern.

CEQA statutes, the California Office of Planning and Research (OPR) guidelines, and the draft proposed changes to the *State CEQA Guidelines* do not currently prescribe specific quantitative thresholds of significance or a particular methodology for conducting an impact analysis related to GHG effects on global climate. Rather, as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency.

Currently, there is no Statewide GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Thresholds and methodology are still being developed and revised by air quality districts in the State. Therefore, this environmental issue remains unsettled and must be evaluated on a case-by-case basis until the South Coast Air Quality Management District (SCAQMD) adopts significance thresholds and GHG emissions impact methodology. In the absence of a qualified Climate Action Plan for the City, SCAQMD thresholds, when adopted, would apply to future development within the City.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group).[6] This Working Group proposed a tiered approach for evaluating GHG emissions for development projects for which SCAQMD is not the lead agency. In the absence of any further guidance from SCAQMD since this proposal in 2008, these draft interim proposed GHG emissions thresholds are used in this analysis. If GHG emissions are less than 1,400 metric tons (MT) of carbon dioxide equivalents (CO_2e) per year, project-level and cumulative GHG emissions are less than significant.

The City's General Plan has adopted a broad spectrum of policies related to climate change, as shown in the Air Quality Element of its General Plan. The General Plan was adopted in 2008 and sets forth the goals, objectives, and policies that guide the City on the implementation of its air quality improvement programs and strategies. The following goals and policies are applicable to the proposed Project.

[5] The principal GHGs of concern contributing to the greenhouse effect are CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Water vapor is the largest naturally occurring GHG; however, it is not identified as an anthropogenic constituent of concern.

[6] SCAQMD. *Greenhouse Gases (GHG) CEQA Significance Thresholds*. Website: http://www.aqmd.gov/ home/ regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds (accessed April 2018).

Goal AQ-2: Increased awareness and participation throughout the community in efforts to reduce air pollution and enhance air quality.

Policy AQ-IMP-2B: Require new development or redevelopment projects to provide pedestrian and bicycle trails access to nearby shopping and employment centers.

Goal AQ-5: Increased energy efficiency and conservation.

Policy AQ-IMP-6D: Require new development to comply with the energy use guidelines in Title 24 of the California Administrative Code.

Individual GHGs have varying global warming potentials and atmospheric lifetimes. Because it is not possible to tie specific GHG emissions to actual changes in climate, this evaluation focuses on the proposed Project's emissions of GHGs. CO_2e is a consistent methodology for comparing GHG emissions because it normalizes various GHGs to the same metric. GHG emissions are typically measured in terms of MT of "CO_2 equivalents" (CO_2e). Therefore, for the purpose of this technical analysis, the concept of CO_2e is used to describe how much global climate change a given type and amount of GHG may cause, using the functionally equivalent amount or concentration of CO_2 as the reference.

Findings of Fact

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

Less-than-Significant Impact. SCAQMD suggests the commercial-use threshold for GHG emissions should be 1,400 $MTCO_2e$ per year. (AQ-29/32). Here, the construction and operation of the proposed Project will generate GHG emissions. The construction of the proposed Project is anticipated to result in about 8.22 amortized $MTCO_2e$ for the period of January through December of 2019. (AQ-29/32). Operationally, the majority of GHG emissions would be generated by vehicle travel and energy consumption. (AQ-29/32). The operation of the proposed Project is anticipated to result in about 911.00 $MTCO_2e$ per year. (AQ-29/32). When the projected construction-related GHG emissions are amortized and then added to the project's operational GHG emissions, the proposed Project's total GHG emissions are projected to be 1,320.24 $MTCO_2e$ per year. (AQ-29/32). Since the projected quantity of GHG emissions remains less than the SCAQMD's suggested 1,400 $MTCO_2e$ per year threshold, the proposed Project's GHG emissions constitute a less-than-significant impact. (AQ-29/32). No mitigation would be required.

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

Less-than-Significant Impact. In 2008, the California Air Resources Board (ARB) approved a Climate Change Scoping Plan as required by Assembly Bill (AB) 32. The Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."

The Climate Change Scoping Plan has a range of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives,

voluntary actions, market-based mechanisms (e.g., a cap-and-trade system), and an AB 32 implementation fee to fund the program.

In November 2017, ARB released an Update to the Climate Change Scoping Plan. In the 2017 Update, nine key focus areas were identified: energy, transportation, agriculture, water, waste management, natural and working lands, short-lived climate pollutants, green buildings, and the cap-and-trade program. The proposed Project's compliance with Title 24 energy use requirements would ensure that the proposed Project would be consistent with AB 32 and the 2008 Climate Change Scoping Plan.

Projects that generate *de minimus* GHG emission levels (e.g., commercial projects generating less than 1,400 $MTCO_2e$ per year) and projects that either do not result in a significant impact or that can be mitigated to a less-than-significant level would be deemed in compliance with local policies regarding GHG emissions. (AQ-31/32). Here, the proposed Project is anticipated to result in about 911.00 $MTCO_2e$ (or 1,320.24 MTCO2eq with amortized construction GHG emissions) on an annual basis. (AQ-31/32). Since this total remains less than the 1,400 $MTCO_2e$ per year threshold, as suggested by SCAQMD for commercial uses, the proposed Project constitutes a less than significant impact. No mitigation would be required.

8. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, 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 or waste into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles 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 has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Background

The Phase I ESA is included herein as Appendix F (Phase I Environmental Site Assessment).

Findings of Fact

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

Less-than-Significant Impact*.* The term "hazardous materials" refers to both hazardous substances and wastes. Under Federal and State laws, any material, including wastes, may be considered hazardous if it is specifically listed by statute or if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes explosions or generates toxic gases). Hazardous substances include all chemicals regulated under the United States Department of Transportation "hazardous materials" regulations and the United States Environmental Protection Agency (EPA) "hazardous waste" regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials is affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

Construction. During construction, hazardous materials (e.g., fuels and lubricants) would be transported to the project site in construction vehicles and equipment. Hazardous materials would be consumed at the site in accordance with occupational safety practices and in compliance with all applicable Federal, State, and local regulations governing the use of hazardous materials, including the mandatory installation of environmental protective measures and best management practices (BMPs). The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing government regulations. The potential for the release of hazardous materials during project construction is low, and even if a release occurred, it would not result in a significant hazard to the public, surrounding land uses, or environment, due to the small quantities of these materials associated with construction vehicles. Compliance with all applicable Federal, State, and local regulations governing the use of hazardous materials reduces potential hazards to the general public and to the environment to a less-than-significant level. No mitigation would be required.

Operation. In limited quantities, not in excess of regulated quantities, hotel operations would routinely include the use, handling, and storage of numerous products that would constitute hazardous materials and/or contain hazardous substances. A variety of commercial cleaning products, disinfectants, lubricants, paints, solvents, insecticides, fertilizers, and similar products are used in routine hotel maintenance. The use of these materials would be limited, and their transport, storage, use, and disposal would be subject to Federal, State, and local requirements. Such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Further, the Hazardous Materials Release Response Plan and Inventory Law of 1985 requires businesses that use, handle, or store hazardous materials to prepare an inventory of hazardous substances on the premises. This plan would include an inventory of hazardous materials, addressing the proper storage, handling, and disposal of hazardous materials; and dictating spill response and notification requirements. The proposed Project would be subject to compliance with this regulation, as well as additional applicable State and local regulations intended to manage the transport, storage, manufacture, and disposal of hazardous materials. Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials resulting from operation of the proposed project would be less than significant, and no mitigation would be 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 or waste into the environment?

Less-than-Significant Impact. A Phase I ESA was prepared to document potential Recognized Environmental Concerns (RECs) associated with the project site. The Phase I ESA included (1) a review of historical sources, (2), a site reconnaissance survey, and (3) interviews with key personnel. A REC is defined by the American Society for Testing and Materials (ASTM) as, "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."

Based on a review of historical resources, the Phase I ESA determined that the past uses of the site as agricultural land from 1938 to 1947, two dwellings from 1947-1953, a boat sales and repair use from 1957-1984, a boat repair use from 1982-1984. From 1984 to 1985, the existing buildings were destroyed and the Mazda dealership was constructed. From 1987-2007, the property was used for car sales and leasing. In 2008, the car sales/lease use was discontinued and the buildings remained vacant. Thereafter, the site was used briefly for fuel storage, and was once proposed as the site of a Vietnam War memorial. On or about July of 2017, the on-site improvements were demolished.

The Phase I ESA identified two historical RECs. First, on the northwest portion of the site, a 1,000 gallon fuel tank was reported to exist during the 1960's when it was used for boat sales and repairs (as identified in 1984 hand drawn site sketch). No records were available for review documenting the removal of the underground storage tank. On October 19, 2011, a geophysical survey was conducted that located two backfilled excavations in the northwest area where the former underground storage tank (UST) was reported to have been located. The Phase I recommended sample borings, the collection of subsurface soil samples, and

analysis of those samples to determine if there was any condition in the subsoil near the two backfilled excavations.

Second, the Phase I ESA identified an inactive two-stage clarifier and floor drains. In 2010, two samples were collected near the ends of the clarifier. Since the site has remained vacant since the clarifier was sampled in 2010, the Phase I ESA concluded that the clarifier is unlikely to pose a significant concern. The Phase I ESA recommended sampling in the area of the floor drains and analysis of those samples to determine if there was any condition in the subsoil. The Phase I ESA further recommended the removal and proper disposal of any soils which may be contaminated in accordance with federal, state, and local regulations.

The Phase I ESA also identified two *de minimus* RECs. In a 1953 aerial photo of the site vicinity, only orchards and agricultural or undeveloped land is shown. Although the site was used for agricultural purposes in the past, the subsequent commercial development of the site minimizes the probability that on-site soil still contains any substantial amount of agricultural chemicals. Soil samples were also collected near the site of possible former leaks of automotive lifts. The analysis showed no indication of contamination. No further actions were recommended.

Construction. The site is currently vacant, and no demolition will be required. Construction of the proposed Project would include grading and other soil disturbances. The proposed Project would be required to comply with Mitigation Measures HAZ-1 and HAZ-2.

> **Mitigation Measure HAZ-1** Soil Management Plan and Health and Safety Plan. Prior to issuance of any grading permit, the Project Applicant shall prepare a Soil Management Plan and a Health and Safety Plan for review and approval by the GGFD. The primary goal of a Soil Management Plan is to minimize risks to owners, developers, and human health and the environment by providing a pre-approved plan for disturbing known or suspected contaminated areas at a construction site. The Health and Safety Plan is a written document that describes the process for identifying the physical and health hazards that could harm workers, procedures to prevent accidents, and steps to take when accidents occur. The Soil Management Plan and Health and Safety Plan shall be consistent with local, State, and federal regulations including but not limited to the requirements of the California Occupational Safety and Health Act (Cal/OSHA) and shall encompass all subsurface soil disturbance activities. The Project Applicant's Construction Contractor (Construction Contractor) shall comply with all requirements detailed in the Soil Management Plan and the Health and Safety Plan during construction. At a minimum, the Soil Management Plan and Health and Safety Plan shall include the following components:
>
> - A summary of all potential risks to construction workers, monitoring programs, maximum limits for all site chemicals, and emergency procedures.
>
> - Procedures for handling excavated soil and/or waste, sampling requirements, management and disposal of contaminated material, and documentation of the disturbance activity.
>
> - A requirement that during all subsurface excavation activities, field technicians shall continuously monitor the soil as it is being excavated with appropriate field instruments.

- A requirement that during all subsurface excavation activities, chemicals of concern associated with petroleum hydrocarbon contaminants shall be continuously monitored and compared to appropriate levels of concern (e.g., Permissible Exposure Levels [PELs], Threshold Limit Values [TLVs], or concentrations Immediately Dangerous to Life and Health [IDLH] in the breathing zone).

- Identification of a Site Health and Safety Officer.

- Methods of contact, phone number, office location, and responsibilities of the Site Health and Safety Officer.

- Specification that the Site Health and Safety Officer shall by contacted immediately by the Construction Contractor if evidence of contaminants is present.

- Emergency Response Plan.

Mitigation Measure HAZ-2 Discovery of Potentially Hazardous Materials. During construction activities, the Construction Contractor shall immediately notify the Director of the Orange County Environmental Health Care Agency (OCHCA) Environmental Health Division, or designee, and the GGFD if any contaminated soil, groundwater, toxic materials, subsurface tanks/piping, or potentially hazardous materials are encountered. The OCHCA shall determine the appropriate procedures for handling and disposal of the materials in accordance with local, State, and federal regulations. In the event that contaminated materials are encountered during grading activities, all work within that immediate area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up remedial and clean-up measures are implemented so as to render that area suitable for work to resume.

With implementation of Mitigation Measures HAZ-1 and HAZ-2, construction of the proposed Project would not create a significant hazard to the public or to the environment through reasonable foreseeable upset and accident conditions regarding the release of hazardous materials into the environment. No mitigation would be required.

Operation. As stated previously, hazardous substances associated with the proposed industrial use would be contained (stored or confined within a specific area) without impacting the environment. Project operation may involve the transport, use, and storage of potentially hazardous materials in the form of chemical soaps, detergents, sanitizers, and disinfectants, as well as fertilizers and pesticides for ornamental landscaping. Such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with existing laws and regulations. Therefore, operation of the proposed Project would not create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation would be required.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school?

Less-than-Significant Impact. The proposed Project directly abuts Santiago High School (12342 Trask Avenue, Garden Grove). No additional school sites exist or are proposed within a 0.25-mile radius of the project site. Based on the nature of the land use and their operational characteristics, hotels are not typically considered as uses that emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes. The proposed Project's compliance with applicable federal, State, and local regulations pertaining to the transport, storage, use, and disposal of hazardous materials provide reasonable assurance that impacts attributable to hazardous materials, substances, and wastes would be less than significant. Therefore, no mitigation would be 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. The proposed Project is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, construction and implementation of the proposed Project would not create a significant hazard to the public or the environment because the site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no mitigation would be required.

e) Would the project for a project located within an airport land-use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The nearest airports to the project site include: (1) John Wayne Airport – Orange County Airport (SNA) (located approximately 6.3 miles to the southeast); (2) Los Alamitos Army Airfield Airport (SLI) (located approximately 6.9 miles to the west); (3) Fullerton Municipal Airport (FUL) (located approximately 8.2 miles to the northeast). The project site is not located within an airport land-use plan or within two miles of a public airport or public use airport. Therefore, construction and implementation of the proposed Project would not result in a safety hazard for people residing or working in the project area, and no mitigation would be required.

f) Would the project for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The project site is not located within the vicinity of a private airstrip.

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

Less-than-Significant Impact. Access to and along Harbor Boulevard will be maintained during the construction and subsequent operation of the proposed Project. Temporary lane closures would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014). Among other things, the manual recommends early coordination with affected agencies to ensure that emergency vehicle access is maintained. Pursuant to the City's standard conditions of approval, the Project Applicant would be required to prepare a Construction Staging and Traffic Management Plan (CSTMP) to ensure that emergency vehicles would be able to navigate through streets adjacent to the project site that may experience congestion due to construction activities. Traffic management personnel (flag persons), required as part of the CSTMP, would be trained to assist in

emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. The CSTMP would also require certain conditions (e.g., providing warning signs, lights, and devices) and would require that the City of Garden Grove Police Department be notified a minimum of 24 hours in advance of any lane closures or roadway work. Maintaining unrestricted access during construction will minimize potential traffic conflicts along designated and undesignated evacuation routes and would avoid any potential interference with any City or County emergency response plans.

The operation of the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed Project would be developed in accordance with City emergency access standards. The proposed Project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on site for emergency vehicles.

For these reasons, potential impacts related to an emergency response plan or emergency evacuation access during construction and operation would be less than significant. No mitigation would be required.

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less-than-Significant Impact*.* Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed camp fires, cigarettes, sparks from automobiles, and other ignition sources. The project site and the surrounding areas are developed with urban and suburban uses and do not include brush-and grass-covered areas typically found in areas susceptible to wildfires. As a result, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death associated with wildland fires. No mitigation would be required. (See Figure 21 - County of Orange - Very High Fire Hazard Severity Zones in Local Responsibility Areas [October 2011].)

Figure 21
COUNTY OF ORANGE - VERY HIGH FIRE HAZARD SEVERITY ZONES IN LOCAL RESPONSIBILITY AREAS
(October 2011)
Source: California Department of Forestry and Fire Protection

9. Hydrology and Water Quality

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

Findings of Fact

a) Would the project violate any water quality standards or waste discharge requirements?

Less-than-Significant Impact*.*

Construction. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction activities and have the potential to be transported via stormwater runoff into receiving waters.

During construction, the total disturbed soil area would be greater than 1 acre. Projects that disturb greater than 1 acre of soil are required to comply with the State Water Resources Control Board's (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002, as amended by Orders Nos. 2010-0014-DWQ and 2012-0006-DWQ) (Construction General Permit or CGP). Moreover, the proposed Project will have to comply with the requirements of the CGP, including the preparation of a "storm water pollution prevention plan" (SWPPP) and implementation of the construction BMPs during construction activities. Construction BMPs include, but not be limited to, erosion and sediment control BMPs designed to minimize erosion and retain sediment, and good housekeeping BMPs to prevent spills and leaks and the discharge of construction debris and wastes into receiving waters.

Operation. The project site was previously developed as the former Garden Grove Mazda and Harbor Auto Center and was almost entirely covered with impervious surfaces. Currently, the proposed Project calls for the approval, construction, and operation of a 124-room Hilton Hotel Project, which includes 2,677 square feet of "soft scape" and an additional 7,491 square feet of "setback landscape area" (collectively totaling 10,168 square feet). The expected pollutants of concern during operation of the proposed Project include suspended solids/sediment, nutrients, pathogens (bacteria and virus), pesticides, oil and grease, and trash and debris. The proposed Project, however, will decrease the amount of impervious surface area on the project site, which would decrease the peak flow of runoff and pollutant loading from the project site. Nonetheless, the proposed Project includes the implementation and maintenance of site design, source control, and Low Impact Development (LID) best management practices (BMPs) to target and reduce pollutant runoff from the site during operations. In addition, through the provision of LID BMPs, the proposed Project will improve the water quality of the storm water runoff being discharged.

Mitigation Measures. No mitigation would be required; however, the following Compliance Measures are standard conditions and/or conditions of approval based on local, State, and federal regulations or laws that serve to reduce impacts related to hydrology and water quality.

Compliance Measures. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the project has minimal impacts to receiving waters and water quality:

Basin Plan. The proposed Project is subject to compliance with the "Water Quality Control Plan – Santa Ana River Basin (8)" (Basin Plan), as adopted by the Regional Water Quality Control Board, Santa Ana Region (SARWQCB) in 1995, as amended. In addition, the proposed Project will fully comply with all applicable local, State, and federal requirements governing water quality, including, but not necessarily limited to:

- Order No. R8-2009-0030, NPDES No. CAS618030 – Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region - Areawide Urban Storm Water Runoff, Orange County," May 22, 2009, as amended by Order No. R8-2010-0062 (NPDES or MS4 Permit);

- County of Orange, the Cities of the Orange County and the Orange County Flood Control District, Drainage Area Management Plan (DAMP), 2007; and

- Orange County Environmental Management Agency, Orange County Hydrology Manual, October 1986 and Orange County Hydrology Manual Addendum No. 1, 1996.

Under the provisions of the MS4 Permit, new development projects that create 10,000 square feet or more of impervious surface or redevelopment projects that add or replace 5,000 square feet of impervious surface are required to retain on each project site a specified volume of storm water runoff from a design storm event and prepare a water quality management plan (WQMP) for submittal and approval by the permitting agency. As approved by the SARWQCB on May 19, 2011 and September 26, 2013, respectively, the County prepared a "Model Water Quality Management Plan" (2011 Model WQMP) and separate "Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans" (December 20, 2013) (2013 TGD) to assist with project development in north and central Orange County. The 2013 TGD notes that a detailed descriptions of BMP maintenance activities is provided in the Los Angeles County Department of Public Works' "Stormwater Best Management Practice Design and Maintenance Manual for Publicly Maintained Storm Drain Systems" (August 2010).

The 2011 Model WQMP identifies controls, referred to as LID BMPs, as well as other BMPs and alternative compliance programs, for new development and significant redevelopment projects that are subject to WQMP requirements pursuant to Section 7.0 (New Development/ Significant Redevelopment) of the DAMP. The City is required to approve the WQMP, including non-structural and structural source control BMPs, prior to the issuance of any grading or building permit.

WQ-1. Construction General Permit. Prior to issuance of a grading permit, the Project/ Applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. R4-2014-0024 NPDES Permit No. CAS004003; Construction General Permit). This shall include submission of Permit Registration Documents, including a Notice of Intent (NOI), to the SWRCB via the Storm Water Multiple Application and Report Tracking System (SMARTS) to obtain coverage under the Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number (WDID) to the City of Garden Grove (City) Community and Economic Development Director, or appropriate designee, to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan

(SWPPP) shall be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit.

WQ-2. Final Water Quality Management Plan. Prior to the issuance of any grading or building permits, the Project Applicant shall prepare a Final Water Quality Management Plan (WQMP). The Final WQMP shall be prepared consistent with the North Orange County Municipal Separate Storm Sewer System (MS4) Permit, the County of Orange Technical Guidance Document (December 2013), the County of Orange Water Quality Management Plan Template (May 2011), and the Drainage Area Management Plan (DAMP) (2003). The Project Applicant shall provide the Final WQMP to the City Community and Economic Development Director, or appropriate designee, for review and approval. The Final WQMP shall:

- Address Site Design BMPs such as minimizing impervious areas, maximizing permeability, minimizing directly connected impervious areas, creating reduced or "zero discharge" areas, and conserving natural areas;
- Incorporate the applicable Routine Source Control BMPs as defined in the DAMP;
- Incorporate Structural and Treatment Control BMPs as defined in the DAMP;
- Generally describe the long-term operation and maintenance requirements for the Treatment Control BMPs;
- Identify the entity that will be responsible for long-term operation and maintenance of the Treatment Control BMPs; and
- Describe the mechanism for funding the long-term operation of the Treatment Control BMPs.

WQ-3. Best Management Practices. Unless otherwise authorized by the Director of the City of Garden Grove Public Works Department or designee, in accordance with the following format, the Final WQMP shall identify those structural and non-structural BMPs that are to be included in the proposed Project:

- ***Section 1 (Site Design BMPs)*** shall include those design practices that can be implemented to reduce the volume of storm water runoff generated on a project site and improve the quality of runoff that leaves the site.
  - Reference: Section 7.II-2.4.4, 2011 Model WQMP and Section 2.4.2, 2013 TGD.
- ***Section 2 (LID and Treatment Control BMPs)*** shall include those structural control measures designed to treat pollutants in storm water runoff prior to the release the treated runoff to surface waters or a storm drain system.
  - Reference: Sections 7.II-2.4-1 and 7.II.3.2, 2011 Model WQMP and Section 2.4.2.5, 2013 TGD.
- ***Section 3 - Hydromodification Control BMPs)*** shall, in the event that a hydrologic condition of concern is identified, include those structural and non-structural control

measures designed to minimize changes in runoff and sediment yield caused by proposed land-use modifications,

- Reference: Section 7.II-2.4.5, 2011, Model WQMP and Section 7.KK-2.4, 2013 TGD.

- ***Section 4 (Source Control BMPs)*** shall include those administrative actions, designs of structural facilities, usage of alternative materials, and operation, maintenance, inspection, and compliance controls aims at eliminating or reducing storm water pollution

  - Reference: Section 7.II-2.4.6, 2011 Model WQMP and Section 2.4.3.2, 2013 TGD.

- ***Section 5 (Operation and Maintenance Plan)*** shall include a BMP operations and maintenance (O&M) plan ensuring on-going and long-term maintenance of all structural BMPs.

  - Reference: Section 7.II-4.0, 2011 Model WQMP and Section 7, 2013 TGD.

WQ-4. Prior to permit closeout, the Director of the City of Garden Grove Public Works Department or designee shall verify that the Project Applicant has: (1) demonstrated that all structural BMPs described in the Final Project WQMP have been constructed and installed in conformance with approved plans and specifications; (2) prepared and submitted a BMP O&M plan for all structural BMPs; (3) demonstrated that a mechanism or agreement has been executed for the on-going, long-term funding and performance of BMP operations, maintenance, repair, and/or replacement; (4) demonstrated that the Private Applicant is prepared to implement all non-structural BMPs described in the Final Project WQMP; and (5) demonstrated that an adequate number of copies of the Final Project WQMP are available on the site.

- Reference: Section 7.5.5, DAMP.

Compliance with existing CGP, SWPPP, NPDES, WQMP, and Basin Plan obligations will ensure that the proposed Project does not result in any violation of any water quality standards or waste discharge requirements.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less-than-Significant Impact. The project site is located above the Coastal Plain of Orange County Groundwater Basin. The project site is not in a designated groundwater recharge area. The Orange County Water District (OCWD) manages groundwater recharge to the Orange County Groundwater Basin. According to OCWD's *Groundwater Management Plan 2015 Update*, OCWD operates 23 recharge facilities encompassing over 1,500 acres of land used for groundwater recharge. These facilities are located in the forebay of the groundwater basin adjacent to the Santa Ana River and Santiago Creek. The project site is not located on land used for groundwater recharge.

As outlined in the OCWD's "Basin 8-1 Alternatives" (January 1, 2017), DWR divided the basin into two primary hydrologic divisions, identified as the "Forebay" and "Pressure" areas, whose boundaries generally delineate the areas where surface water or shallow groundwater can or cannot move downward to the first producible aquifer in quantities significant from a water-supply perspective. The Forebay refers to the area of intake or recharge where the major basin aquifers are replenished by either direct percolation from surface water or downward groundwater flow from overlying, hydraulically-connected aquifers. The area is characterized by a stratigraphic sequence of relatively coarse-grained deposits of sands and gravels with occasional lenses of clay and silt. These clay and silt lenses do not generally impede groundwater flow from one aquifer to another. The Pressure area is generally defined as the area of the basin where large quantities of surface water and near-surface groundwater are impeded from percolating into the major producible aquifers by clay and silt layers at shallow depths (upper 50 feet). This area is characterized by semi-perched groundwater at depths of less than 50 feet, with substantially clayey or silty sediments in the shallow subsurface.

In a general sense, the Pressure area is defined as that part of the basin where surface water and near-surface groundwater are prevented from percolating in large quantities into the major producible aquifers by clay and silt layers of shall depths (upper 50 feet). Because the principal and deeper aquifers within the Pressure area are under "confined" conditions (under hydrostatic pressure), the water levels in wells penetrating these aquifers exhibit large seasonal variations in response to pumping.

The project site is located within the Pressure area. In the area of Harbor Boulevard, the area of demarcation between these two hydrologic divisions is located midway between Garden Grove Boulevard and the Garden Grove (SR-22) Freeway, less than one-half-miles to the north of the proposed hotel site. As depicted in Figure 27 (Groundwater Contour Map [June 2014]), groundwater levels in the vicinity of the project site are depicted as being about 50 to 60 feet below ground level (BGL).

As further depicted in Figure 27 (Groundwater Contour Map [June 2014]), in the Forebay area, the highest groundwater contour levels are in the general area of the State College Boulevard/ Orangewood Avenue intersection and extend in a northwesterly direction to the general area of the Harbor Boulevard/Lincoln Avenue intersection.

In contrast, as depicted in Figure 28 (Historically Highest Groundwater Contours [1997]), in the California Department of Conservation's "Seismic Hazard Zone Report for the Anaheim and Newport Beach 7.5-Minute Quadrangles, Orange County, California, Seismic Hazard Zone Report 03" (1997) reports that the historically highest groundwater levels in the vicinity of the project site range between 5 and 10 feet BGL.

Construction. Grading and construction activities would compact soil, which can decrease infiltration during construction. However, the size of the construction area for the proposed Project would be minimal compared to the overall size of the groundwater basin; therefore, there would not be a substantial change in infiltration or groundwater recharge compared to the existing condition.

Moreover, no groundwater resources will be used for or during the construction of the proposed Project. Excavation activities for footing and utility lines would not be anticipated to be deeper than was associated with the site's former use (Garden Grove Mazda). Impacts would be less than significant.

Operation. Operation of the proposed Project would not require groundwater extraction. This project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts would be less than significant.

Mitigation Measures. No mitigation would be required; however, the following Compliance Measures are standard conditions and/or conditions of approval based on local, State, and federal regulations or laws that serve to reduce impacts related to hydrology and water quality.

Compliance Measures. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the project has minimal impacts to receiving waters and water quality:

The SARWQCB has issued Order No. R8-2003-0061 and amendments to NPDES Permit No. CAG998001 (Dewatering Permit) to regulate the discharge of dewatering wastes from construction, subterranean seepage, and other similar types of discharges considered to have "de minimus" impacts on water quality. This general permit was updated by Order No. R8-2009-0003 in March 2009 and applies to projects located within the City. To obtain coverage under this permit, an applicant must submit a "Notice of Intent" (NOI) to the SARWQCB and data establishing the chemical characteristics of the dewatering discharge. A standard monitoring and reporting program, including water sampling analysis and reporting of dewatering related discharges, is part of the permit's requirements. Compliance with these applicable permit obligations would ensure that all impacts on groundwater resources, if any, are reduced to a less-than-significant level.

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, in a manner which would result in substantial erosion or siltation on or off the site?

Less-than-Significant Impact.

Construction. During construction activities, excavated soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and the transport of sediment downstream. Additionally, during a storm event, soil erosion could occur at an accelerated rate. As discussed in Response (a) and specified in Compliance Measures WQ-1, the Construction General Permit requires preparation of an SWPPP and implementation of construction BMPs to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation.

Operation. The project site was previously developed as the former Garden Grove Mazda and Harbor Auto Center and was almost entirely covered with impervious surfaces. Currently, the proposed Project calls for the approval, construction, and operation of a 124-room Hilton Hotel Project, which includes 2,677 square feet of "soft scape" and an additional 7,491 square feet of "setback landscape area" (collectively totaling 10,168 square feet). Based on the incorporation of both structural and non-structural BMPs, the quality of the storm water discharge to the storm drain system will improve. As a result, impacts would be less than significant.

Mitigation Measures. No mitigation would be required. Compliance Measures WQ-1, WQ-2, and WQ-3 listed above in (a), would be implemented to reduce impacts related to erosion and siltation.

d) Would the project substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off the site?

Less-than-Significant Impact. Construction. Construction activities would alter the on-site drainage pattern and potentially compact on-site soils. As discussed in Response (a) and as specified in Compliance Measure WQ-1, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts to water quality during construction. Proper management of storm water during construction would reduce impacts associated with flooding***.***

Operation. The project site was previously developed as the former Garden Grove Mazda and Harbor Auto Center and was almost entirely covered with impervious surfaces. Currently, the proposed Project calls for the approval, construction, and operation of a 124-room Hilton Hotel Project, which includes 2,677 square feet of "soft scape" and an additional 7,491 square feet of "setback landscape area" (collectively totaling 10,168 square feet). Based on the incorporation of both structural and non-structural BMPs, the quality of the storm water discharge to the storm drain system will improve. Additionally, as specified by Compliance Measure WQ-5, as outlined below, a final detailed Hydrology Report will be prepared in order to ensure that storm drain facilities serving the project site are appropriately sized to accommodate stormwater runoff and ensure that on-site flooding would not occur. Therefore, with the implementation of Compliance Measures WQ-2, WQ-3, and WQ-5, potential impacts related to on- or off-site flooding resulting from the alteration of existing drainage patterns on the site would be less than significant.

Mitigation Measures. No mitigation would be required. In addition to Compliance Measures WQ-2 and WQ-3 listed in Response (a), Compliance Measure WQ-5 listed below would be implemented to reduce impacts related to drainage.

Compliance Measures. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the project has minimal impacts to receiving waters and water quality:

WQ-5 Hydrology Report. Prior to issuance of grading permits, the Project Applicant shall submit a final Hydrology Report, or equivalent, to the City Community and Economic Development Director, or appropriate designee, for review and approval. The hydrology report shall demonstrate, based on hydrologic calculations, that the project's on-site storm conveyance and retention facilities are designed in accordance with the requirement of the Orange County Public Works *Orange County Hydrology Manual* (October 1986, Addendum 1996).

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less-than-Significant Impact.

Construction. Drainage patterns could be temporarily altered during construction activities, and construction-related pollutants such as liquid and petroleum products and concrete-related waste could be spilled, leaked, or transported via storm runoff into adjacent drainages and into downstream receiving waters. As specified in Compliance Measure WQ-1, the proposed Project would be required to comply with requirements set forth by the Construction General Permit, which requires preparation of an SWPPP and implementation of construction BMPs to control stormwater runoff and discharge of pollutants.

Operation. The project site was formerly operated as Garden Grove Mazda. Based, in part, on the need to maximize the area available for vehicle display, only about 1,800 square feet (0.3 percent) of the site was landscaped. As proposed, a total of 10,168 square feet of "soft scape" and "setback landscape area" (15.6 percent) will include pervious surface areas. More rainwater will directly permeate into the groundwater basin and less rainwater will be discharged to the storm drain system. The increased landscaping services as a hydromodification by reducing the quantity of storm waters being discharged.

Mitigation Measures. No mitigation would be required; however, with adherence to Compliance Measures WQ-1 and WQ-5, project impacts associated with the introduction of substantial sources of polluted runoff or additional runoff would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less-than-Significant Impact*.* Compliance with the MS4 Permit, DAMP, 2011 Model WQMP, and 2013 TGD and implementation of Compliance Measures WQ-1, through WQ-5 would ensure that any construction and operational water quality impact attributable to the proposed Project would remain below a level of significance. No mitigation would be required.

g) Would the project place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?

No Impact*.* The proposed Project does not include a housing component. Therefore, the proposed Project would not place housing within a 100-year flood hazard area. No impacts would occur related to placement of housing within a 100-year flood hazard area, and no mitigation would be required.

h) Would the project place structures in a 100-year flood hazard area that would impede or redirect flood flows?

Less-than-Significant Impact. As indicated in Figure 29 (Flood Insurance Rate Map No. 06059C0143J [December 3, 2009]), the project site is depicted on "Flood Insurance Rate Map Orange County, California and Incorporated Areas, Panel 143 of 539, Panel 0143J, Map No. 06059C0143J" (revised December 3, 2009) and is identified as being a "Special Flood Hazard Area subject to inundation by the 1% annual flood" (Zone A). Although located within a 100-year flood hazard area, because the project site exists within an urban area or a previously developed site, the proposed Project would not substantially impede or redirect flood flows. No mitigation would be required.

i) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less-than-Significant Impact. A levee is a type of dam that runs along the banks of a river or canal that provides flood protection. A levee system failure could create severe flooding and high water velocities. The project site is not in an area protected by a levee.

Dam failure is defined as the structural collapse of a dam that releases the water stored in a reservoir behind the dam. A dam failure is usually the result of the age of the structure, inadequate spillway capacity, or structural damage caused by an earthquake or flood. According to the Safety Element of the County of Orange General Plan (2012), the project site, along with the entire City, is within the Prado Dam Inundation Area. Prado Dam is an earth-fill dam across the Santa Ana River at the Chino Hills near the City of Corona in Riverside County. The impounded water behind Prado Dam creates the Prado Flood Control Basin Reservoir.

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

Prado Dam is maintained and inspected to ensure its integrity and to ensure that risks are minimized. In addition, construction of the Santa Ana River Mainstem Project was initiated in 1989, and is scheduled for completion in 2020. The Santa Ana River Mainstem Project will increase levels of flood protection to more than 3.35 million people in Orange, San Bernardino, and Riverside Counties. Improvements to 23 miles of the Lower Santa Ana River channel, from Prado Dam to the Pacific Ocean, are 95 percent complete, with the remaining bank protection improvements in Yorba Linda currently under construction. Improvements to the Santa Ana River channel include construction of new levees and dikes. In addition, the Santa Ana River Mainstem Project includes improvements to Prado Dam that are currently underway and are estimated to be completed in 2021. The Prado Dam embankment has been raised, and the outlet works have been reconstructed to convey additional discharges. Remaining improvements to Prado Dam include acquisition of additional land for the expansion of the Prado Reservoir, construction of protective dikes, and raising of the spillway (Orange County Flood Division, Prado Dam 2018a; Santa Ana River 2018b).

Although the proposed Project would construct new structures in an inundation zone, the proposed project would not increase or exacerbate the chance of inundation from the failure of Prado Dam. Therefore, project impacts related to the exposure of people and structures to significant risk associated with flooding as a result of dam failure would be less than significant. No mitigation would be required.

j) Would the project result in to inundation by seiche, tsunami, or mudflow?

No Impact. Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) in an enclosed or partially enclosed bodies of water, such as reservoirs, lakes, harbors, and bays. Such waves can flood adjacent properties. There are no major water-retaining structures located near the project site; therefore, there is no risk of inundation on the project site from a seismically induced seiche. The risk associated with seiches is, therefore, not considered a potential hazard or a potentially significant impact, and no mitigation would be required.

Tsunamis are generated wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and volcanic eruptions. The project site is approximately 10 miles from the Pacific Ocean. According to the State of California Department of Conservation Tsunami Inundation Maps, the project site is not located within a tsunami inundation area. The risk associated with tsunamis is, therefore, not considered a potential hazard or a potentially significant impact, and no mitigation would be required.

Mudslides and slumps are described as a shallower type of slope failure, usually affecting the upper soil mantle or weathered bedrock underlying natural slopes and triggered by surface or shallow subsurface saturation. The project site is relatively flat and is not located downslope of any area of potential mudflow. The risk associated with mudflow is, therefore, not considered a potential hazard or a potentially significant impact, and no mitigation would be required.

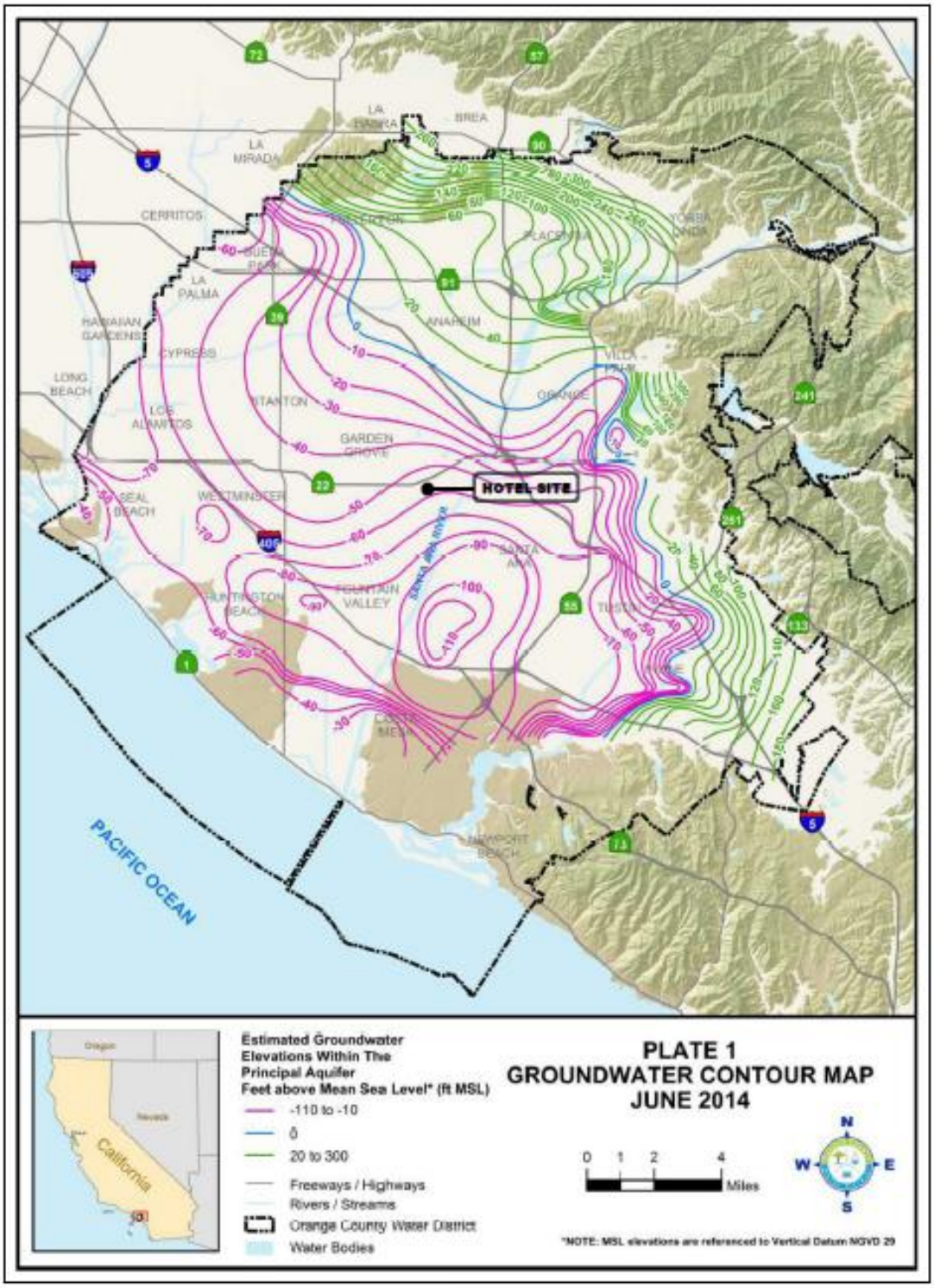


Figure 27
***GROUNDWATER CONTOUR MAP** (June 2014)*
Source: Orange County Water District

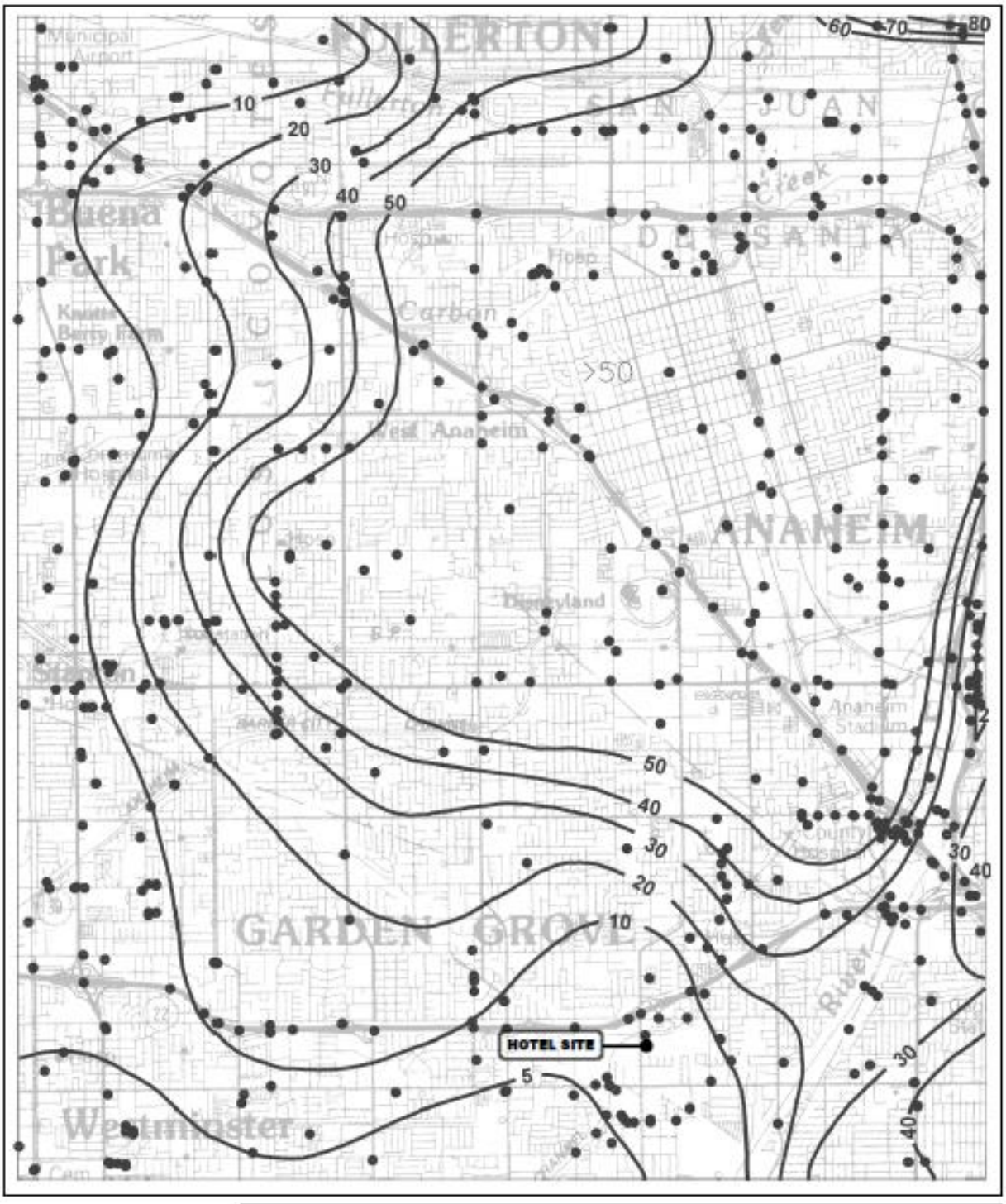
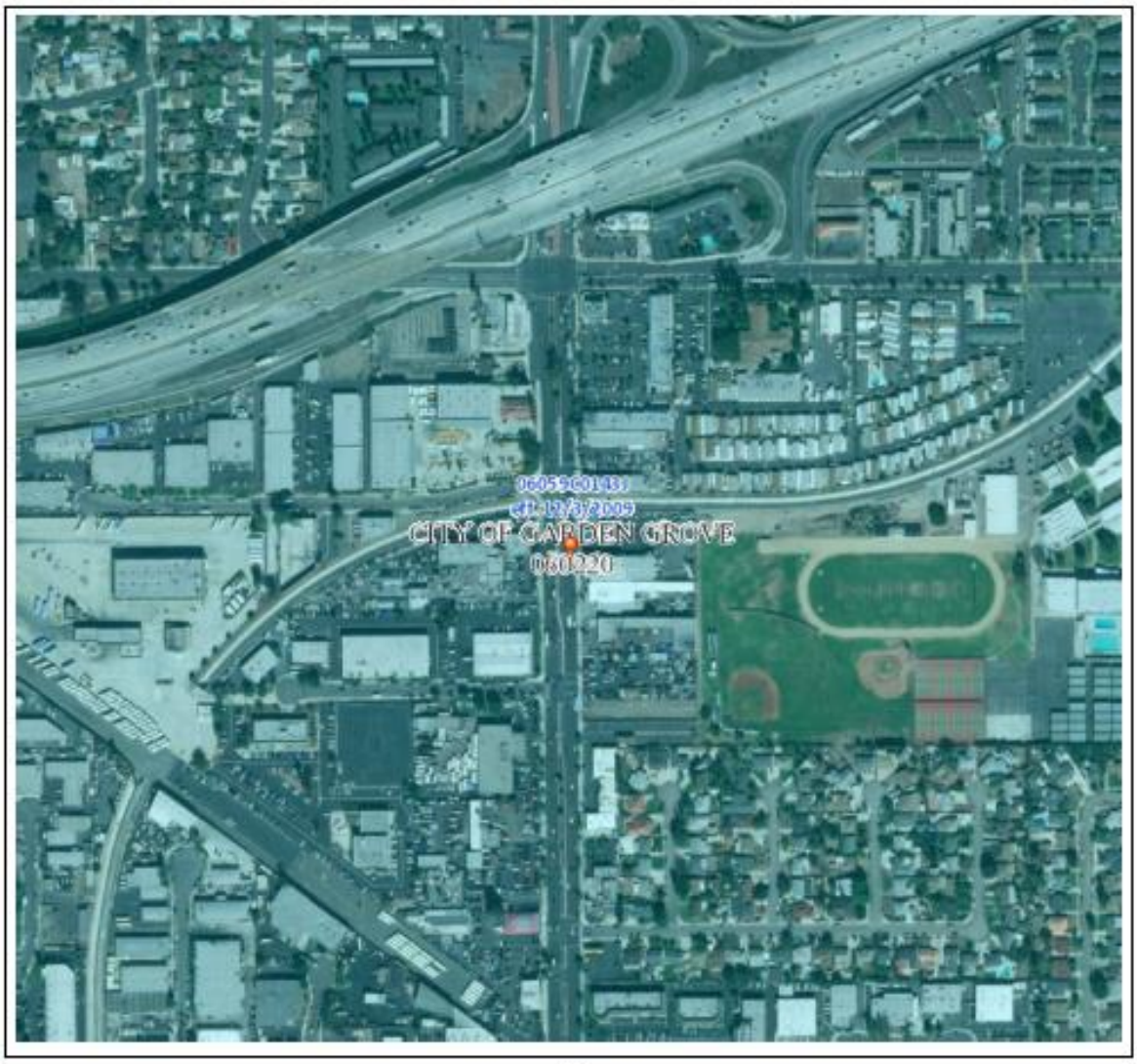
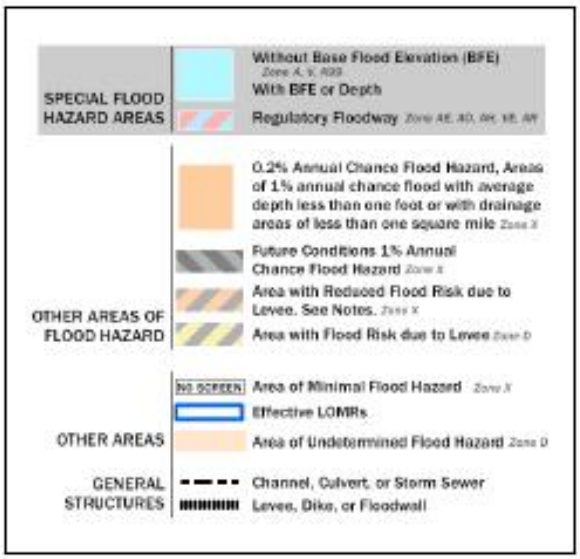


Figure 28
***HISTORICALLY HIGHEST GROUNDWATER CONTOURS** (1997)*
Source: California Department of Conservation, Division of Mines and Geology





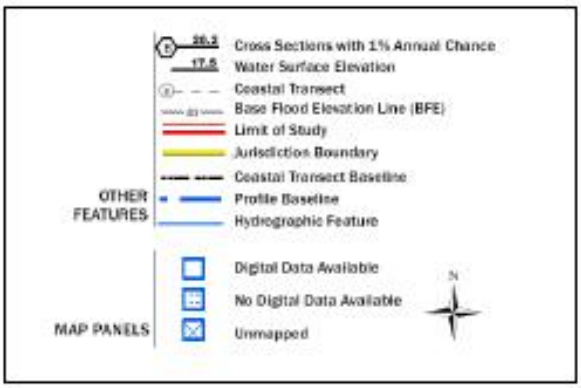


Figure 29
***FLOOD INSURANCE RATE MAP NO. 06059C0143J** (December 3, 2009)*
Source: Federal Emergency Management Agency

10. Land Use and Planning

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with an applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Findings of Fact

a) Would the project physically divide an established community?

No Impact. The project site is approximately 1.5 acres in size located on the east side of Harbor Boulevard, between Trask Avenue and Westminster Street. The project site is located within an area predominately dominated by commercial and industrial (e.g., automotive-related) uses. Specifically, the project is bounded by commercial uses to the north, northwest, and south, by Harbor Boulevard and a car dealership to the west, by Santiago High School to the east, and by multifamily residences to the northeast. The project site was previously developed and operated as a commercial use. The proposed Project calls for the construction and operation of a new commercial use within the constraints of the existing project site. The proposed Project, therefore, would not result in physical divisions within any established community.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The main documents regulating land use on the project site are the City of Garden Grove General Plan and the City's Zoning Code. The project site is designated Heavy Commercial and Zoned C-3 Heavy Commercial.

***General Plan*.** The City's General Plan is a policy document guiding future development within the City. The City's General Plan is a comprehensive plan intended to guide growth and development in the City.

"The Heavy Commercial designation is intended to provide for a variety of more intensive commercial uses, some of which may be incompatible with residential neighborhoods." (GGGP p. 2-24.) This designation includes, "automotive repair, sales, and services; wholesaling; automotive body work, or contractors' storage yards." (GGGP p. 2-24.) Hotels,

such as the proposed Project, are conditionally permitted in the Heavy Commercial designation.

There will be no change in the General Plan designation for the project site, and the project site will continue to operate as a commercial use. The proposed Project includes a proposed general plan amendment to modify the applicable FAR within the Heavy Commercial designation. The proposed Project, as designed, cannot proceed without the proposed general plan amendment. With the proposed general plan amendment, the proposed Project would be consistent with the of the City's General Plan land use designation and would be consistent with the surrounding uses in the area which are primarily heavy commercial uses.

***Zoning Code*.** The City's Zoning Code is the primary implementation tool for the goals and policies contained in the Land Use Element. For this reason, the Zoning Map must be consistent with the General Plan Land Use Map. The City's Land Use Map indicates the general location and extent of future development in the City. The City's Zoning Map, contains more specific information related to permitted land uses, building intensities, and development standards.

The zoning district that implements the Heavy Commercial designation is C-3. (GGGP p. 2-24.) The C-3 Zone is also known as the "Heavy Commercial Zone." (Municipal Code § 9.04.050(B)(2)(d).) The C-3 Zone is intended to provide for a wide variety of commercial uses, primarily more intensive services and uses of wholesale/retail combinations, normally incompatible with other commercial activities or residential uses. (Municipal Code § 9.16.020.020(A)(4).) Hotels are conditionally permitted in the C-3 Zone. (Municipal Code § 9.16.020.030.)

The project site is zoned C-3, and will not be changed as a part of the proposed Project. The proposed Project calls for amendments to the C-3 zone including modifications to the applicable FAR for hotels, modifications to the applicable FAR for other non-hotel uses, and a change in the permissible number of stories and building heights. The proposed Project, as designed, cannot proceed without the proposed municipal code amendments. With the proposed municipal code amendments, the proposed Project would be consistent with the City's Zoning Code and would be consistent with the surrounding uses in the area which are primarily heavy commercial uses.

c) Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

No Impact. As previously stated, the project site is currently developed and is located in an urban area. There project site is not located in or adjacent to an existing or proposed Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other habitat conservation plan in the City of Garden Grove. More specifically, the City is not located within the boundaries of the Orange County Central/Coastal NCCP/HCP. Therefore, the proposed Project would have no impact on any local, regional, or state habitat conservation plan.

11. Mineral Resources

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Findings of Fact

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?

No Impact.

In 1975, the California Legislature enacted the Surface Mining and Reclamation Act (SMARA) which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into four Mineral Resource Zones (MRZ):

MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated.

MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

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

The project site has been classified by the California Department of Mines and Geology (CDMG) as being located in MRZ-1, indicating that the project site is located in an area where adequate information indicates that no significant mineral deposits are present, or where it is

judged that little likelihood exists for their presence.[7] In addition, the project site is not designated or zoned for the extraction of mineral deposits. (See Figure 30 - Mineral Resource Extraction Activities in the General Project Area.)

The proposed Project would not result in the loss of a known commercially valuable or locally important mineral resource. No impacts to known mineral resources would occur as a result of the proposed Project.

[7] California Division of Mines and Geology. Mineral Land Classification Map. Greater Los Angeles Area, Special Report 143, Part III. Website: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/sr/SR.../PartIII/ SR_143 _partIII_Text.pdf (accessed August 22, 2018).

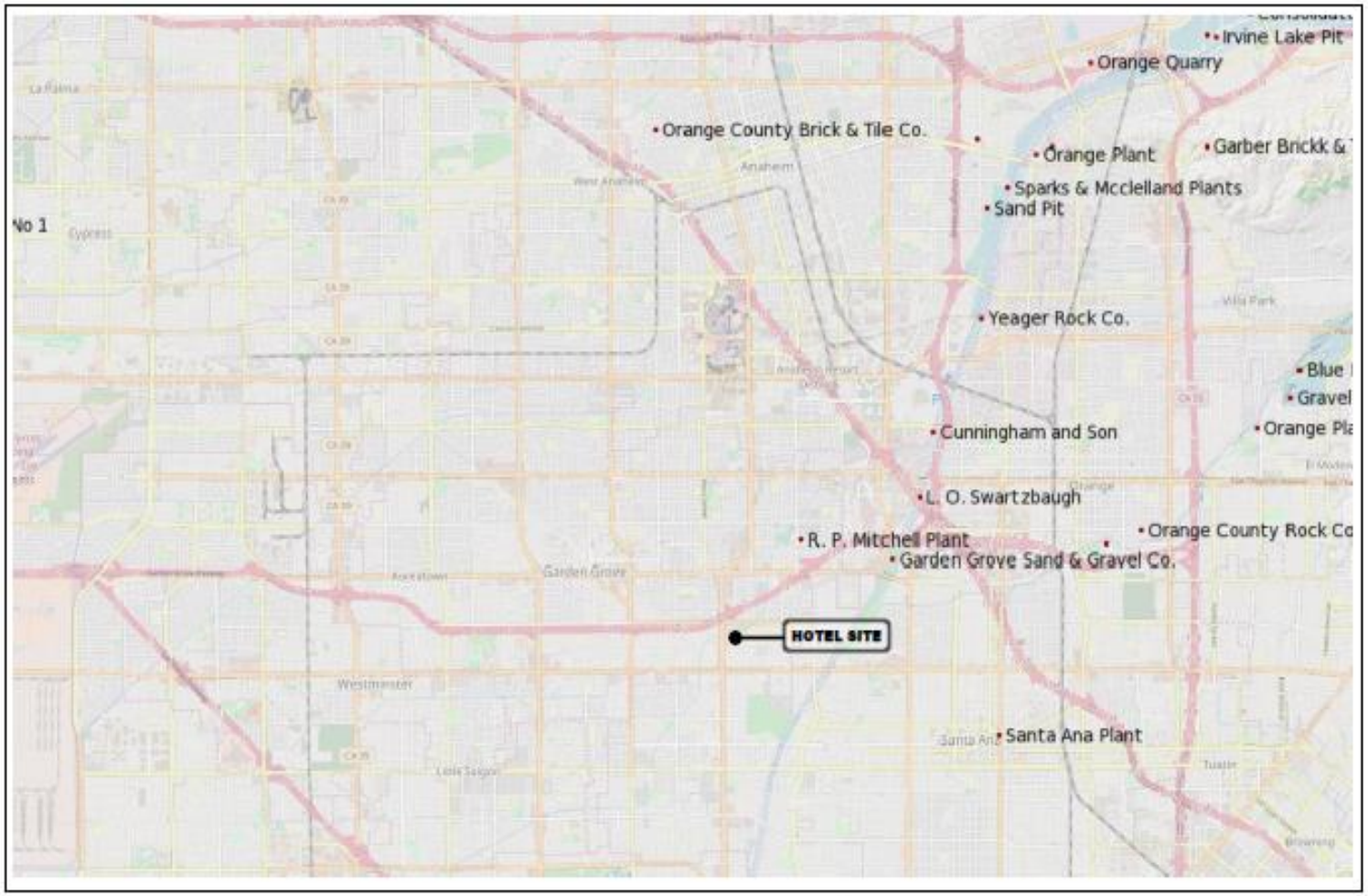


Figure 30
MINERAL RESOURCE EXTRACTION ACTIVITIES IN THE GENERAL PROJECT AREA
Source: United States Bureau of Mines

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?

No Impact*.* As stated in Response 11(a), the project site is classified as MRZ-1, indicating the site is located where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. No mineral extraction activities occur on the project site, and it is not located within an area known to contain locally important mineral resources. Therefore, no impact to locally-important mineral resources would occur as a result of the proposed Project.

12. Noise

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels above those existing prior to the implementation of the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise?	☐	☐	☐	☒

Background Information

Noise standards are established to regulate noise levels in both residential and non-residential settings. “Noise-sensitive receptors” include residential neighborhoods, hotels, hospitals, schools, and outdoor recreation areas. Noise-sensitive receptors located in proximity to the project site include both near-site residents (e.g., Meadowlark Mobile Estates [12152 Trask Avenue, Garden Grove]) and a school (e.g., Santiago High School [12342 Trask Avenue, Garden Grove]).

Characteristics of Sound. Sound is increasing to such disagreeable levels in the environment that it can threaten quality of life. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a sound wave resulting in the tone's range from high to low. Loudness is the strength of a sound and is used to describe a noisy or quiet environment. It is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound. Sound intensity is measured through the A-weighted decibel scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound, similar to the human ear's de-emphasis of such frequencies. Decibels, unlike linear units (e.g., inches or pounds), are measured on a logarithmic scale representing points on a sharply rising curve.

For example, 10 decibels (dB) is 10 times more intense than 1 dB, 20 dB is 100 times more intense than 1 dB, and 30 dB is 1,000 times more intense than 1 dB. Thirty decibels (30 dB) represents 1,000 times as much acoustic energy as 1 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from its source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If a sound is produced by a line source (e.g., highway traffic or railroad operations), it decreases 3 dB for each doubling of distance in a hard site environment. In a relatively flat environment with absorptive vegetation, sound produced by a line source decreases 4.5 dB for each doubling of distance.

There are many metrics used to rate potential noise impacts. First, the determination of whether the source type is stationary or non-stationary is made. For the purposes of noise analyses, non-stationary sources include roadway traffic, as well as train and aircraft operations, which are often governed by criteria presented in the jurisdiction's Noise Element of the General Plan. For all stationary sources, which also includes mobile noise sources located within specific property boundaries, the appropriate noise criteria are often contained in the local jurisdiction's Municipal Code.

The base metric for assessing noise level impacts is the equivalent continuous sound level (L_{eq}), which calculates the total sound energy of time-varying noise over a sample period. For stationary

sources that operate intermittently within an hour, percentile noise levels are used for enforcement purposes. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level—that is, half the time the noise level exceeds this level, and half the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, the L_{eq} and L_{50} are approximately the same. Should a source operate for a period of less than 1 minute or create impact noise,[8] then the maximum instantaneous noise level (L_{max}) is utilized, which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis for short-term noise impacts are specified in terms of maximum levels denoted by L_{max}, which reflects peak operating conditions and addresses the annoying aspects of intermittent noise as well as the appropriate percentile noise level criteria.

To assess non-stationary noise sources, the predominant rating scales for human communities in the State of California are Community Noise Equivalent Level (CNEL) and the day-night average noise level (L_{dn}) based on A-weighted decibels (dBA). CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours), and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The City uses the CNEL noise scale for long-term traffic noise impact assessment.

Noise impacts can be described in three categories. The first category includes audible impacts that refer to increases in noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3 dB or greater because this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, refers to a change in the noise level between 1 dB and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category includes changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels (3 dB or greater) are considered potentially significant.

Physiological Effects of Noise. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear (the threshold of pain). A sound level of 160–165 dBA will result in dizziness or the loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less developed areas.

Characteristics of Vibration. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors where the motion may be discernible. However, without the effects associated with the shaking of a building, there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby

[8] "Impact noise" refers to sound resulting from an instance when an object collides with another object.

buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Building damage is not a factor for normal development projects with the occasional exception of blasting and pile driving during construction. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 vibration velocity decibels (VdB) or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 ft of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 ft (Federal Transit Administration [FTA] 2006). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects, it is assumed that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction of the project could result in ground-borne vibration that could be perceptible and annoying. Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path usually will be greater than ground-borne noise.

Ground-borne vibration has the potential to disturb people as well as damage buildings. Although it is very rare for ground-borne vibration to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage nearby buildings (FTA's *Transit Noise and Vibration Impact Assessment,* 2006). Ground-borne vibration is usually measured in terms of vibration velocity, which includes either the root-mean-square (RMS) velocity or peak particle velocity (PPV). RMS is best for characterizing human response to building vibration, and PPV is used to characterize the potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration.

TABLE 4
HUMAN RESPONSE TO DIFFERENT LEVELS OF GROUND-BORNE NOISE AND VIBRATION

Vibration Velocity Level	Noise Level		Human Response
	Low Freq[1]	Mid Freq[2]	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound usually inaudible; mid-frequency sound excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level unacceptable. Low-frequency noise acceptable for sleeping areas; mid-frequency noise annoying in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration acceptable only if there are an infrequent number of events per day. Low-frequency noise unacceptable for sleeping areas; mid-frequency noise unacceptable even for infrequent events with institutional land uses (e.g., schools and churches).

[1] Approximate noise level when vibration spectrum peak is near 30 Hz.
[2] Approximate noise level when vibration spectrum peak is near 60 Hz.
dBA = A-weighted decibels Hz = Hertz
Freq = Frequency VdB = vibration velocity decibels
Source: Table 7-1. *Transit Noise and Vibration Impact Assessment,* Federal Transit Administration (2006).

Factors that influence ground-borne vibration and noise include the following:

Vibration Source: Vehicle suspension, wheel types and condition, track/roadway surface, track support system, speed, transit structure, and depth of vibration source.

Vibration Path: Soil type, rock layers, soil layering, depth to water table, and frost depth.

Vibration Receiver: Foundation type, building construction, and acoustical absorption.

Among the factors listed above, there are significant differences in the vibration characteristics when the source is underground compared to at the ground surface. In addition, soil conditions are known to have a strong influence on the levels of ground-borne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock.

Experience with ground-borne vibration indicates that (1) vibration propagation is more efficient in stiff clay soils than in loose sandy soils, and (2) shallow rock seems to concentrate the vibration energy close to the surface and can result in ground-borne vibration problems at large distances from the track. Factors such as layering of the soil and depth to water table can have significant effects on the propagation of ground-borne vibration. Soft, loose, sandy soils tend to attenuate more vibration energy than hard, rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils.

Applicable Noise Standards. The applicable noise standards governing the project site are contained in the City's Noise Element of the General Plan (Noise Element) and Chapter 8.47 of the City's Municipal Code. In accordance with the Municipal Code, a noise level increase of 5 dBA over the ambient base noise level or existing average ambient noise level at an adjacent property line is considered a noise violation.

General Plan. California Government Code Section 65302(g) requires that a Noise Element be included in the General Plan of each county and city in the State. The Noise Element of the City General Plan is intended to identify sources of noise and provide objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. Overall, the City's Noise Element describes the noise environment (including noise sources) in the City, addresses noise mitigation regulations, strategies, and programs, as well as delineating Federal, State, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise.

The City's noise standards are correlated with land use categories in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. The City uses the community noise compatibility guidelines established by the State Department of Health Services as a tool for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City's General Plan Noise Element in terms of the CNEL.

Municipal Code. Section 8.47.040 of the GGMC (Ambient Base Noise Levels) provides ambient base noise levels that can be used to determine noise level exceedances.

Applicable Vibration Standards

Due to the lack of vibration standards developed for projects similar to the proposed Project, vibration standards included in the FTA *Transit Noise and Vibration Impact Assessment* (2006) are used in this analysis for ground-borne vibration impacts, as shown in Table 3.12.C.

The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. Table 3.12.C lists the potential vibration damage criteria associated with construction activities, as suggested in the *Transit Noise and Vibration Impact Assessment* (FTA 2006).

TABLE 5
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (inch/sec)	Approximate L_V (VdB)[1]
Reinforced concrete, steel, or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Nonengineered timber and masonry buildings	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

Source: Table 12-3. *Transit Noise and Vibration Impact Assessment,* Federal Transit Administration (2006).
[1] RMS vibration velocity in decibels (VdB) re 1 micro-inch/second.
inch/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

FTA guidelines show that a vibration level of up to 102 vibration velocity in decibels (VdB) (an equivalent to 0.5 inch per second [inch/sec] in PPV) (FTA 2006) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a nonengineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 inch/sec in PPV). The PPV values for building damage thresholds referenced above are also shown in Table 3.12.D, taken from the *Transportation and Construction Vibration Guidance Manual* (Caltrans 2013), which included additional building definitions and vibration building damage thresholds. Vibration impacts are discussed under Section (b).

Thresholds of Significance

The project is located in the City of Garden Grove and is subject to the provisions of the "Noise Element" of the GGGP and "Noise Ordinance" of the GGMC, as codified in Chapter 8.47 (Noise Control) therein. The "Noise Element" of the GGGP establishes noise standards and policies within the City. Presented therein (Table 7-1) is reference to those standards established by the California Department of Health Services, defined as "the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise." Table 6 (City of Garden Grove General Plan - Noise and Land Use Compatibility Matrix) is extracted therefrom. The proposed Project falls within the "conditionally acceptable" range for transient lodging.

TABLE 6
CITY OF GARDEN GROVE GENERAL PLAN
NOISE AND LAND USE COMPATIBILITY MATRIX

Land Use Category	*Community Noise Exposure*[1] *(Ldn or CNEL, dBA)*			
	Normally Acceptable	*Conditionally Acceptable*	*Normally Unacceptable*	*Clearly Unacceptable*
Residential - Low Density, Single-Family, Duplex, Mobile Homes	*50-60*	*55-70*	*70-75*	*75-85*
Residential – Multiple Family	*50-65*	*60-70*	*70-75*	*70-85*
Transient Lodging – Motel, Hotels	*50-65*	*60-70*	*70-80*	*80-85*
Schools, Libraries, Churches, Hospitals, Nursing Homes	*50-70*	*60-70*	*70-80*	*80-85*
Auditoriums, Concert Halls, Amphitheaters	*NA*[2]	*50-70*	*NA*	*65-85*
Sports Arenas, Outdoor Spectator Sports	*NA*	*50-75*	*NA*	*70-85*
Playground, Neighborhood Parks	*50-70*	*NA*	*67.5-75*	*72.5-85*
Golf Courses, Riding Stables, Water Recreation, Cemeteries	*50-70*	*NA*	*70-80*	*80-85*
Office Buildings, Business Commercial and Professional	*50-70*	*67.5-77.5*	*75-85*	*NA*
Industrial, Manufacturing, Utilities, Agriculture	*50-75*	*70-80*	*75-85*	*NA*

Notes:
1. *Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.*
   Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
   Normally Unacceptable – New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
   Clearly Unacceptable – New construction or development should generally not be undertaken.
2. *NA = Not Applicable*

Source: Office of Planning and Research, California, General Plan Guidelines, October 2003

Pursuant to Chapter 8.47 (Noise Control) of the GGMC, noise levels applicable to the proposed Project are depicted in Table 7 (City of Garden Grove Municipal Code – Noise Standards). As indicated in Table 8 (City of Garden Grove Municipal Code – Permitted Increases in Noise by Duration), as authorized under Section 8.47.050(C) of the GGMC, short-term exceedances of those standards are permitted. Construction activities are regulated under Section 8.47.060 in Chapter 47 (Noise Control) of the GGMC. As indicated therein: "It shall be unlawful for any person within a residential area, or within a radius of five hundred (500) feet there from, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects, or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device between the hours of 10:00 p.m. of one day and 7:00 a.m. of the next day in such a manner that a person of normal sensitiveness, as determined utilizing the criteria established in Section 8.47.050(B), is caused discomfort or annoyance unless such operations are of an emergency nature."

TABLE 7
CITY OF GARDEN GROVE MUNICIPAL CODE
NOISE STANDARDS

Land-Use Designation		Ambient Base Noise Level	Time of Day
Sensitive Uses	Residential Use	55 dBA	7:00 AM – 10:00 PM
		50 dBA	10:00 PM – 7:00 AM
Conditionally Sensitive	Institutional Use	65 dBA	Any Time
	Office-Professional Use	65 dBA	Any Time
	Hotels & Motels	65 dBA	Any Time
Non-Sensitive	Commercial Uses	70 dBA	Any Time
	Commercial / Industrial Uses within 150 feet of Residential	65 dBA	7:00 AM – 10:00 PM
		50 dBA	10:00 PM – 7:00 AM
	Industrial Use	70 dBA	Any Time

Source: City of Garden Grove

TABLE 8
CITY OF GARDEN GROVE MUNICIPAL CODE
PERMITTED INCREASES IN NOISE BY DURATION

Duration of Increase	Permitted Noise Increase
30 min. (L_{50})	-
15 min. (L_{25})	5 dBA
5 min. (L_8)	10 dBA
1 min. (L_2)	15 dBA
Less than 1 minute (L_{MAX})	20 dBA

Source: City of Garden Grove

In California, allowable interior noise standards are specified in Section 1207.4 (Allowable Interior Noise Levels) in Chapter 12 (Interior Environment), of the 2016 California Building Code (2016 CBC). As specified therein: "Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan." The CNEL is a 24-hour time-weighted noise exposure level metric used exclusively in California. The CNEL metric is calculated by adding a 5 dBA weighting for noises occurring during the evening hours (7:00 PM to 10:00 PM) and by adding a 10 dBA weighting for noises occurring during the nighttime hours (10:00 PM to 7:00 AM). These time periods and weightings were selected to reflect a person's increased sensitivity to noises during late night and early morning hours.

As specified in Section 120.1(a) of the 2016 CBC: "All enclosed spaces in a building shall be ventilated in accordance with the requirements of this section and the California Building Code. (2) The outdoor air-ventilation rate and air-distribution assumptions made in the design of the ventilating system shall be clearly identified on the plans required by Section 10-103 of Title 24, Part 1." Pursuant to Section 120.1(b)(2) therein: "Each space that is not naturally ventilated under Item 1 above shall be ventilated with a mechanical system capable of providing an outdoor air rate no less than the larger of: (A) The conditioned floor area of the space times the applicable ventilation rate from Table 120.1-A; or (B) 15 cfm [cubic feet per minute] per person times the expected number of occupants." Table 120.1-A (Minimum Ventilation Rate) specified, in part:

Type of Use	*CFM per Square Foot of Conditioned Floor Area*
Hotel Guest Room (less than 500 square feet)	*30 cfm/guest room*
Hotel Guest Room (500 square feet or greater)	*0/15*

The 2016 Green Building Standards Code (Title 24, Part 11, CCR) (2016 CalGreen) imposes separate and distinct obligations for residential and non-residential buildings. As specified herein, hotels are categorized as residential buildings. Although not directly applicable to the proposed Project, with regard to non-residential buildings, Chapter 5 (Nonresidential Mandatory Measures) therein contains mandatory measures for building construction in Section 5.507 (Environmental Comfort). These noise standards are applied for the purpose of controlling interior noise levels resulting from exterior noise sources. In addition, Appendix A4 (Residential Voluntary Measures), Division A4.5 (Environmental Quality), identified Section 5.507 (Environmental Comfort) as a voluntary measure for residential building construction (e.g., hotels, motels, and lodging houses).

As specified therein, non-residential buildings located within transportation noise contours of 65 dBA CNEL or Ldn are required to evaluate the building shell to provide acceptable interior sound levels. As stipulated in Section 5.507.4 (Acoustical Controls) therein, all newly constructed non-residential buildings shall "[e]mploy building assemblies and components with Sound Transmission Class (STC) values determined in accordance with ASTM E90 and ASTM E413 or Outdoor-Indoor Sound Transmission Class (OITC) determined in accordance with ASTM E1332, using either the prescriptive or performance method in Section 5.507.4.1 or 5.507.4.2." 2016 CalGreen provides two methods for meeting interior sound level standards:

- ***Prescriptive method****.* The prescriptive method stipulates a minimum building envelope composite STC rating of 50 (OITC 40) with exterior windows meeting a minimum STC rating of 40 (OITC 30) (Section 5.507.4.2). The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL. If the development falls within a transportation 65 dBA CNEL noise contour, the combined STC rating of the wall and roof-ceiling assemblies must be at least 50 (Section 5.507.4.1). For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA hourly Leq for any hour of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1.1).

- ***Performance method***. The 2016 CBC no longer requires that multi-family residential or transient lodging facilities meet an Ldn sound level limit of 45 dB(A). Instead, Section 5.507.4.2 (Performance Method) of CalGreen requires that buildings within transportation noise contours of 65 dBA (or higher) CNEL or Ldn be required to evaluate the building shell to ensure the interior environment does not exceed an hourly Leq of 50 dBA in occupied areas during any hour of operation (Section 5.507.4.2). Under those performance provisions, an acoustical analysis documenting complying interior sound levels shall be prepared by personnel approved by the architect or engineer of record (Section 5.507.4.2.2).

In addition, with regard to interior sound transmission, wall and floor-ceiling assemblies separating tenant spaces and public places shall have an STC of at least 40.

Each component of the building shell contributes to sound isolation quality of the envelope. Exterior noise intrusion for a typical hotel room can come through the wall, but more typically it comes through the windows or through a heating, ventilation, and air conditioning (HVAC) vent. The following general minimum construction standards have been assumed:

- All joints in exterior walls shall be sealed airtight around windows and doors, at the wall perimeter and at major seams.

- All above ground penetrations of exterior walls by electrical and plumbing components, windows, and the like shall be sealed airtight on both sides of the wall with a resilient, non-hardening caulking or mastic.

- Basic exterior wall construction shall comprise the following material of equal surface weight and Sound Transmission Class (STC rating): (1) 2" x 4" wood or metal studs at 16 to 24 inches on center; (2) Minimum R-13 insulation in the stud cavities; (3) 5/8" thick gypsum wallboard fastened to the interior face of the wood studs; the wall shall be fully taped and finished and sealed around the perimeter with a combination of backer rod and resilient, non-hardening caulking; (4) the exterior surface shall be finished with 3-coat (minimum ¾" thick) stucco system or with another product with equal or greater surface weight; (5) Ceilings shall be finished with a minimum 5/8" gypsum board with minimum R-19 insulation in the ceiling: (6) Windows shall have a minimum STC rating of 28 or better; windows shall have an air infiltration rate of less than or equal to 0.20 cubic feet per minute per linear foot (cfm/lin. ft.) when tested with a 25 mph wind per ASTM standards; (7) There shall be no need to open windows to provide a habitable interior environment.

Ventilation or air-conditioning systems shall consist of an individual vertical terminal air conditioning (VTAC) unit for each guest room. The VTAC system is a through-the-wall installation which is hidden inside an enclosure which looks like a closet. The unit is controlled with a wall thermostat and some units are capable of being controlled by a central location. A VTAC system located in a closet was assumed to perform at an equivalent STC 28 (OITC 20) or better.

Findings of Fact

A detailed noise study was prepared as part of this CEQA-compliance effort. The resulting "Acoustical Analysis" (June 29, 2018) is included in Appendix G (13650 Harbor Boulevard Hotel Project - Noise Impact Study).

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less-than-Significant Impact with Mitigation Incorporated.

Construction. Short-term noise impacts would occur during construction of the proposed Project. Construction-related, short-term noise levels would be higher than existing ambient noise levels in the vicinity of the project site, but would cease once project construction is completed.

Construction is conducted in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics that change the character of the noise generated on site. Therefore, the noise levels will vary as construction progresses. Despite the variety in the types and sizes of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 9 shows typical construction noise levels for different types of equipment. This data was compiled by the Environmental Protection Agency (EPA). These noise levels would diminish rapidly with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 86 dBA measured 50 feet from the noise source would reduce to 80 dBA at 100 feet. At 200 feet from the noise source, the noise level would reduce to 74 dBA. At 400 feet the noise source would reduce by another 6 dBA to 68 dBA. During the construction period, the contractors would be required to comply with the City's Noise Ordinance.

TABLE 9
TYPICAL CONSTRUCTION NOISE LEVELS

Type	Noise Levels (dBA) at 50 Feet
Earth Moving	
Compactors (Rollers)	73 - 76
Front Loaders	73 - 84
Backhoes	73 - 92
Tractors	75 - 95
Scrapers, Graders	78 - 92
Pavers	85 - 87
Trucks	81 - 94
Materials Handling	
Concrete Mixers	72 - 87
Concrete Pumps	81 - 83
Cranes (Movable)	72 - 86
Cranes (Derrick)	85 - 87
Stationary	
Pumps	68 - 71
Generators	71 - 83
Compressors	75 - 86
Impact Equipment	
Pneumatic Wrenches	82 - 87
Jack Hammers, Rock Drills	80 - 99
Pile Drivers (Peak)	95-105
Other	
Vibrators	68 - 82
Saws	71 - 82

[1] Referenced Noise Levels from the Environmental Protection Agency (EPA)

The FTA provides criteria to assess construction noise impacts in its Transit Noise and Vibration Impact Assessment. The FTA's criteria are based on the potential for construction noise to result in adverse community reaction.

Compliance with the City's Noise Ordinance would ensure that construction noise impacts are reduced to the greatest extent feasible. Although construction noise would be higher than the ambient noise in the project vicinity, construction noise would cease to occur once the proposed Project's construction is completed. For residential uses, the daytime noise threshold is 80 dBA Leq for an 8-hour period. In compliance with the City's Municipal Code, it is assumed construction would not occur during the noise-sensitive nighttime hours.

Table 10 shows the results of the construction noise impact analysis for typical phases of construction and equipment usage. As shown in Table 10, construction activity would be below the 8-hour Leq noise criteria threshold.

TABLE 10
CONSTRUCTION NOISE LEVELS (dBA)[1]

Phase	Equipment	Quantity	Calculated Noise Level (dBA)		Combined Noise Level (dBA)	
			Lmax	Leq	Lmax	Leq
Site Preparation	Graders	1	79.0	75.0		
	Rubber Tired Dozers	1	75.6	71.7		
	Tractors/Loaders/Backhoes	1	78.0	74.0	79.0	78.5
Grading	Graders	1	79.0	75.0		
	Rubber Tired Dozers	1	75.6	71.7		
	Tractors/Loaders/Backhoes	1	78.0	74.0	79.0	78.5
Building Construction	Cranes	1	74.5	66.6		
	Forklifts	1	69.0	65.0		
	Generator Sets	1	74.6	71.6		
	Tractors/Loaders/Backhoes	1	78.0	74.0		
	Welders	3	68.0	64.0	78.0	77.4
Paving	Cement and Mortar Mixers	1	72.8	68.8		
	Pavers	1	71.2	68.2		
	Paving Equipment	1	74.0	67.0		
	Rollers	1	74.0	67.0		
	Tractors/Loaders/Backhoes	1	78.0	74.0	78.0	76.9
Architectural Coating	Air Compressors	1	71.6	67.7	71.6	67.7
Maximum Construction Phase Noise Level - Leq (dBA)					78.5	
FTA Construction Noise Criteria (Detailed Assessment: 8-Hour Leq)[2]					80.0	
Potentially Significant Short-Term Noise Impact (Yes/No?)					No	

[1] Construction noise levels calculated using the Federal Highway Administration Roadway Construction Noise Model Version 1.1. Noise levels calculated based on average distance of equipment over an 8-hour period (near center of the site); 100 feet from property line.

[2] Construction noise criteria based on the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (May 2006).

Mitigation Measure NOI-1 would limit construction hours to be consistent with the Municipal Code, and would require the implementation of noise-reducing measures during construction.

NOI-1. Construction Noise: Prior to issuance of building permits, the City Community and Economic Development Director, or designee, shall verify that grading and construction plans include the following requirements to ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved:

- Construction activities occurring as part of the project shall be subject to the limitations and requirements of the GGMC, which states that construction activities shall occur only between the hours of 7:00 a.m. and 10:00 p.m.

- During all project area excavation and on-site grading, the Construction Contractor shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

Therefore, with the implementation of Mitigation Measure NOI-1, construction noise impacts would be less than significant.

Operation. The proposed Project will operate on a 24-hour per day and 7-days per week schedule and will remain open on a 365-day per year basis. As to sensitive receptors, including both Meadowlark Mobile Estates and Santiago High School, the proposed Project will not result in the exposure of persons to or generation of noise levels in excess of standards established in the GGGP, GGMC, and applicable standards of other public agencies. In addition, the proposed Project will not result in a substantial permanent increase in ambient noise levels in the general project vicinity above those levels associated with existing project conditions.

Noise measurement data indicates that the existing site and surrounding area experience daytime noise levels ranging from approximately 53.5 dBA near the eastern property line to 69.6 dBA Leq along Harbor Boulevard. Vehicle traffic along Harbor Boulevard is the major existing sound source impacting the project site. The introduction of project-related traffic is not anticipated to add appreciably to the existing noise environment (See Transportation and Traffic, Appendix H – the proposed Project is anticipated to increase daily traffic by 558 trips, including 25 trips in the a.m. peak hour and 32 trips in the p.m. peak hour).

The main source of stationary noise impacting the adjacent residential homes and high school/institutional land uses would be from typical operational activities of a hotel, such as noise from truck loading and delivery activities, parking lot noise, trash truck collection, and rooftop HVAC equipment. The pool area faces west, away from the sensitive land uses and shielded by the hotel and a perimeter wall, and would not be considered a major source of noise impacting the adjacent sensitive uses.

Loading and delivery activities are expected to take place in the porte-cochere area near the main entrance of the hotel. The loading area is located approximately 225 feet from the adjacent residential homes and 205 feet from the high school property line. Loading activities would mainly consist of box truck deliveries. Heavy duty semi tractor-trailer deliveries would not be common for this type of project.

Parking lot noise would occur from vehicle engine idling and exhaust, doors slamming, tires screeching, people talking, and the occasional horn honking. Parking lot noise would occur throughout the site and is conservatively assessed center of drive aisles closest to adjacent uses; approximately 75 feet from the residential homes and 37 feet from the property line of the high school.

Trash collection would occur in the northeast corner of the project site at the trash enclosure area. Trash truck noise would be considered an infrequent event, typically only occurring a few times per week. The trash enclosure area is located approximately 66 feet from the residential homes and 18 feet from the high school property line. The trash enclosure area would be surrounded by a 10-foot concrete/masonry block wall, shielding the adjacent uses from noise and sight.

Two (2) HVAC air handler equipment units are expected to be located on the roof, approximately 50 feet above pad level. The closest HVAC units will be located approximately 187 feet from the nearest residential units and 175 feet from the high school property line.

Tables 13 and 14 in the Noise Study indicate that stationary noise impacts to the residential properties to the North of the property would not result in a significant change in noise levels as a result of the proposed Project either during the daytime or nighttime. (See Noise Study, Appendix G.) In addition, Table 15 of the Noise Study indicates that stationary noise impacts at the Santiago High School property line to the East of the proposed Project would not result in a significant change in noise levels as a result of the proposed Project during the daytime. (See Noise Study, Appendix G.) Specifically, none of these receptors would experience an increase of 3 dBA or more in ambient noise levels as a result of the proposed Project.

As an additional consideration, the proposed Project will be exposed to mobile source noise generated by traffic along Harbor Boulevard. Based on the project's proximity to Harbor Boulevard, noise levels will range from approximately 62.9 dBA CNEL at the ground floor outdoor pool area to 68.6 dBA CNEL at the second-floor building facade facing Harbor Boulevard. In order to meet the habitable room interior noise standard of 45 dBA CNEL, the project must incorporate building construction techniques that will achieve a minimum noise reduction of 26.4 dBA on the second floor to 26.1 dBA on the fifth floor. A "windows closed" condition and upgraded STC-rated windows are, therefore, required for all habitable hotel rooms facing Harbor Boulevard.

Noise attenuation measures designed to demonstrate compliance with applicable noise standards are presented in Appendix G (13650 Harbor Boulevard Hotel Project - Noise Impact Study). As adapted therefrom, the following mitigation measures are recommended herein:

- ***NOI-2***. Prior to issuance of building permits, the project proponent shall demonstrate to the Building Official's satisfaction that the proposed building shell and window assemblies will achieve an exterior-to-interior noise reduction that will meet the requirements of Section 1207.4 (Allowable Interior Noise Levels) in Chapter 12 (Interior Environment) of the 2016 California Building Code.

- ***NOI-3***. To accommodate a "window closed" condition, in accordance with the requirements of Section 120.1(a) through 120.1(e) of the 2016 California Building Code, all habitable hotel room shall be equipped with appropriate mechanical ventilation.

- ***NOI-4***. Windows and sliding glass doors will require a minimum STC rating of 31 or higher on all the floors.

Because many constitute existing obligations, not presented herein as mitigation measures, the following "design features" were identified in the Appendix G (13650 Harbor Boulevard Hotel Project - Noise Impact Study): (1) All rooftop mounted HVAC equipment shall be shielded or enclosed from the line of sight of adjacent properties. Shielding/parapet wall should be at least as high as the equipment. (2) Provide a six- foot high block wall along the northern and eastern property line to shield adjacent sensitive land uses from project noise. (3) Provide a seven-foot-high block wall with transparent glass to surround the outdoor pool area. The designed noise screening will only be accomplished if the barrier's weight is at least 3.5 pounds per square foot of face area without decorative cutouts, line-of-site openings or gaps between the masonry block and transparent glass material. The noise control barrier should be constructed using masonry block and 3/8" thick acrylic, polycarbonate, laminated glass, or other transparent material with sufficient weight per square foot. (4) Provide concrete masonry unit (CMU) block wall enclosure around trash area to shield adjacent properties. (5) Delivery, loading/unloading activity, and trash pick-up hours shall be limited to daytime (7:00

AM-10:00 PM) hours only. (6) Limit engine idling time for all delivery vehicles and trucks to 5 minutes or less. (7) For proper interior acoustical performance, all exterior windows, doors, and sliding glass doors must have a positive seal and leaks/cracks must be kept to a minimum. (8) Construction-related noise activities shall comply with the requirements set forth in Section 8.47 of the GGMC. (9) Construction activities shall not take place between the hours of 10:00 PM and 7:00 AM on weekdays, including Saturday, or at any time on Sunday or a federal holiday. (10) No impact pile driving activities shall be allowed on the project site. (11) During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices and equipment shall be maintained so that vehicles and their loads are secured from rattling and banging. Idling equipment should be turned off when not in use. (12) Locate staging area, generators and stationary construction equipment as far from the north and east property line, as reasonably feasible. (13) Obtain a construction work permit from the City of Garden Grove prior to starting construction.

Therefore, with the implementation of Mitigation Measures NOI-2, NOI-3, and NOI-4, operational noise impacts would be less than significant.

b) Would the project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Less-than-Significant Impact.

Construction. To determine the vibratory impacts during construction, reference construction equipment vibration levels were utilized and then extrapolated to the façade of the nearest adjacent structures. For this proposed Project, the nearest structures are located along the southern property line. For purposes of assessing structural impacts from vibration, the nearest sensitive receptors are considered “modern industrial/commercial buildings”. No historical or fragile buildings are known to be located within the vicinity of the site.

The construction of the proposed Project would not require the use of substantial vibration inducing equipment or activities, such as pile drivers or blasting. The main sources of vibration impacts during construction of the project would be from bulldozer activity during site preparation and truck loading activity throughout the construction process.

The construction vibration assessment utilizes the referenced vibration levels and methodology set-forth within the Caltrans Transportation and Construction Induced Vibration Guidance Manual. Table 11 shows the referenced vibration levels.

TABLE 11
TYPICAL CONSTRUCTION VIBRATION LEVELS[1]

Equipment	Peak Particle Velocity (PPV) (inches/second) at 25 feet	Approximate Vibration Level (LV) at 25 feet
Piledriver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Piledriver (sonic)	0.734 (upper range) 0.170 (typical)	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldowzer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

[1] Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2005.

Table 12 shows the project's construction-related vibration analysis at the residential structures to the south.

TABLE 12
CONSTRUCTION VIBRATION ANALYSIS - SOUTH

Construction Activity	Distance to Nearest Structure (ft) at South	Duration	Calculated Vibration Level - PPV (in/sec)	Damage Potential
Loaded Trucks	10	Continuous/Frequent	0.208	Fragile Buildings[1]
Large Bulldozer	10	Continuous/Frequent	0.244	Fragile Buildings[1]

[1] Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006.

The estimated vibration noise levels at the nearest sensitive receptors are compared to the Caltrans Vibration Manual thresholds. The damage potential to the nearest structures would be within the "fragile buildings" category. No potential damage would be expected to the modern commercial buildings in the nearby vicinity. Therefore, the construction of the proposed Project would not result in the generation of excessive ground-borne vibration.

Operation. As a hotel, the proposed Project would not be anticipated to generate operational vibration impacts other than those associated with vehicles on-site (either visiting the hotel, making deliveries, or providing trash removal services. Because the rubber tires and suspension systems of trucks and other on-road vehicles provide vibration isolation and reduce noise, it is unusual for on-road vehicles to cause ground-borne noise or vibration problems. Most problems with on-road vehicle-related noise and vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Smoothing the bump or filling the pothole would usually solve the problem. The proposed Project would include a new paved

surface; therefore, project-related vehicular traffic would not result in significant ground-borne noise or vibration impacts, and no mitigation would be required.

c) Would the project result in a substantial permanent increase in ambient noise levels above those existing prior to the implementation of the project?

Less-than-Significant Impact. The proposed Project will not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, see (a) above. No mitigation would be required.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

***Less-than-Significant Impact*.** Construction activities are exempt from the noise standards in the GGMC. Absent local standards, the United States Department of Transportation, Federal Transit Administration (FTA) "Transit Noise and Vibration Impact Assessment" (2006) criteria was used to assess the potential significant of construction noise. For residential uses, a daytime noise threshold standard of 80 dBA Leq for an 8-hour period was used in this assessment. Because construction activity would be below the 8-hour Leq noise criteria threshold, temporary and periodic noise impacts would be less than significant. See (a) above. No mitigation would be required.

e) Would the project result in, for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest airports to the project site include: (1) John Wayne Airport – Orange County Airport (SNA) (located approximately 6.3 miles to the southeast); (2) Los Alamitos Army Airfield Airport (SLI) (located approximately 6.9 miles to the west); (3) Fullerton Municipal Airport (FUL) (located approximately 8.2 miles to the northeast). The project site is not located within an airport land-use plan or within two miles of a public airport or public use airport; therefore, the proposed Project would not expose people residing or working in the project area to excessive noise levels.

f) Would the project result in, for a project near a private airstrip, would it expose people residing or working in the project area to excessive noise?

No Impact. The proposed Project is not located near a private airstrip.

13. Population and Housing

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐

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

Background Information

On May 18, 2018, the California Employment Development Department's Labor Market Information Division reported that the unemployment rate in the Orange County was 2.6 percent in April 2018, down from a revised 2.8 percent in March 2018, and below the year-ago estimate of 3.4 percent. This compares with an unadjusted unemployment rate of 3.8 percent for California and 3.7 percent for the nation during the same period.

Findings of Fact

a) Would the project induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

Less-than-Significant Impact.

***Construction*.** Construction of the proposed Project would provide short-term jobs for the period of January through December of 2019. Many of the construction jobs would be temporary and would be specific to the variety of construction tasks to be completed. It is anticipated that the project-related construction labor force would already be located in the project vicinity, and workers would not be expected to relocate their places of residence as a consequence of working on the proposed Project. Therefore, the proposed Project would not be expected to induce substantial population growth or demand for housing through increased construction employment.

Operation. The proposed Project would not cause or result in direct population growth because it does not include a housing component and the potential employment opportunities associated with the proposed commercial use can be reasonably filled by the area's existing labor force.

The proposed Project is anticipated to require 25 full-time and part-time employees. As of January 2018, the City had a labor force of 24,500, and the County had a labor force of 1,621,800, with approximately 600 and 50,700 people unemployed, respectively.[9] The January 2018 unemployment rate was 2.4 percent for the City and 3.1 percent for the County.[10] This suggests an available local and regional labor pool to serve the long-term

[9] State of California Employment Development Department. 2018. Monthly Labor Force Data for Cities and Census Designated Places, January 2018. June 21, 2017. Website: http://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html#CCD (accessed on March 14, 2018).

[10] Ibid.

employment opportunities offered by the proposed Project. It is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need

Additionally, no infrastructure improvements are proposed that would increase the available capacity of existing infrastructure so as to accommodate additional growth.

Moreover, projects which are deemed consistent with local general plans are not generally considered to be growth inducing. With the exception of proposed changes to existing design standards, the proposed Project is consistent with the GGGP and GGMC, and no changes to the City's land-use policy and/or zoning map are contemplated herein.

For these reasons, operation of the proposed Project would not induce substantial population growth or accelerate development in an underdeveloped area, and any impacts to population growth would be less than significant. Therefore, construction and operation of the proposed Project would have a less than significant impact on population growth, and no mitigation would be required.

b) Would the project displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact*.* No housing currently exists on the project site, and housing displacement would not occur as a result of project implementation. Therefore, the proposed Project would not result in an impact related to the displacement of housing, and no mitigation would be required.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact*.* No housing currently exists on the project site, and no people would be displaced as a result of project implementation. Therefore, the proposed Project would not displace substantial numbers of people, necessitating the construction of replacement housing, and no mitigation would be required.

14. Public Services

	Potentially Significant Impact	Less than Significant Impact 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 or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
1. Fire protection?	☐	☐	☒	☐
2. Police protection?	☐	☐	☒	☐

3. Schools?	☐	☐	☒	☐
4. Parks?	☐	☐	☒	☐
5. Other public facilities?	☐	☐	☐	☒

Background Information

Fire Protection

Fire protection services would be provided to the proposed Project by the Garden Grove Fire Department (GGFD). The GGFD provides fire suppression and prevention, emergency medical and rescue services, hazardous materials response, and public education activities to the City's residents and has a total of seven stations within the City limits.[11] The GGFD routinely reviews proposed development plans as part of City's plan check process and, as appropriate, provides the City with comments thereupon. Operating from seven municipal fire stations, the GGFD's front-line apparatus includes seven engine companies, including four paramedic assessment engine companies, two full paramedic engine companies, one truck company (100-foot aerial ladder truck with tiller), one shift command unit, one paramedic squad, and one air utility unit. Additional fire apparatus is held in reserve, including an additional 100-foot aerial ladder truck with tiller.

The GGFD's total emergency activity includes 25 percent fire protection and 75 percent emergency medical services.[12] Currently, GGFD employs 92 full-time sworn firefighters.[13] In the City's 2017-2018 & 2018-2019 Annual Budget, there are 96 sworn firefighters budgeted.[14]

The GGFD is divided into two primary divisions: the Fire Operations Division and the Administrative Services/Fire Marshal Division. The Fire Operations Division consists of the fire training and emergency services operations, whereas the Administrative Services/Fire Marshal Division consists of fire investigation activities and the Fire Prevention Bureau (i.e., plan check, public information, and public education services and activities).

Police Protection

Police protection and law enforcement services are provided to the City by the Garden Grove Police Department (GGPD). The GGPD is currently divided into three bureaus: Community Policing, Administrative Services, and Support Services. The GGPD is located at 11301 Acacia Parkway, approximately 5 miles southeast of the project site. The project site falls within the GGPD's Western Division. Currently, the GGPD employs approximately 159 full-time sworn officers.[15] In the City's 2017–2018 and 2018–2019 Annual Budgets, there are 166 officers

[11] City of Garden Grove Fire Department. Facts & Figures. Website: https://www.ci.garden-grove.ca.us/fire/facts (accessed March 19, 2018).
[12] Ibid.
[13] City of Garden Grove Fire Department. Website: https://www.ci.garden-grove.ca.us/fire (accessed March 19, 2018).
[14] City of Garden Grove. Budget 2017–2018 & 2018–2019. Website: https://www.ci.garden-grove.ca.us/city-files/17-18%2618-19-budget.pdf (accessed March 19, 2018).
[15] City of Garden Grove Police Department. Website: https://www.ci.garden-grove. ca.us/police (accessed March 19, 2018).

budgeted.[16] With a current City population of 174,858,[17] the service ratio of officers to residents is approximately 0.91 to 1,000.[18]

In Fiscal Year 2016–2017, the GGPD responded to 68,359 calls for service with an average response time of 4 minutes, 52 seconds, for priority calls.[19] The GGFD's current response time goal is no more than 5 minutes.[20] As such, the GGPD is currently meeting its response time goals. The GGPD routinely reviews proposed development plans as part of City's plan check process and, as appropriate, provides the City comments thereupon.

Schools

The proposed Project is located within the Garden Grove Unified School District (GGUSD). The GGUSD currently encompasses 28 square miles and includes schools within the City, as well as schools in the Cities of Anaheim, Cypress, Fountain Valley, Santa Ana, Stanton, and Westminster.[21] As the third largest school district in the County, approximately 45,000 students from preschool to high school are currently enrolled in one of GGUSD's 68 public schools.[22] Additionally, more than 5,000 full-time and part-time employees work at the GGUSD, making it the largest employer in the City.[23]

Parks

The Community Services Department oversees the operation and maintenance of parks and recreational facilities throughout the City. According to the City's Parks, Recreation, and Open Space Element, the City currently maintains 14 parks and uses 5 public schools as additional park facilities through joint-use agreements with the GGUSD, totaling 157.1 acres of parkland throughout the City. The General Plan Parks, Recreation, and Open Space Element requires the provision of 2 acres of parkland per 1,000 residents.

Other Public Services

The Orange County Public Library (OCPL) system provides library services within the jurisdictions of the County's cities as well as unincorporated areas.[24] There are three library branches currently serving the City: Garden Grove Tibor Rubin Branch located at 11962 Bailey Street (approximately 2.1 miles southwest of the project site); Garden Grove Chapman Branch located at 9182

[16] City of Garden Grove. Budgets 2017–2018 and 2018–2019. Website: https://www.ci.garden-grove.ca.us/city-files/17-18%2618-19-budget.pdf (accessed March 19, 2018).
[17] U.S. Census Bureau. 2011–2015 American Community Survey 5-Year Estimates. Table DP05. Website: https://www.census.gov/programs-surveys/acs/data/summary-file.2015.html (accessed August 18, 2017).
[18] Calculation: 174,858 residents / 1,000 = 174.858; 159 / 174.858 = 0.909.
[19] City of Garden Grove. City Performance Report, Fiscal Year July 1, 2016-June 30, 2017. Website: https://www.ci.garden-grove.ca.us/internet/pdf/citymanager/2016-2017performancereport.pdf (accessed March 21, 2018).
[20] City of Garden Grove. Budget 2015–2016. Website: https://www.ci.garden-grove.ca.us/internet/pdf/finance/2015-2016_citybudget.pdf (accessed March 19, 2018).
[21] Garden Grove Unified School District. Schools. Website: http://www.ggusd.us/schools#elementary (accessed March 16, 2018).
[22] Garden Grove Unified School District. Employment. Website: http://www.ggusd.us/employment (accessed March 15, 2018).
[23] Ibid.
[24] Orange County Public Libraries. About OCPL. Website: http://ocpl.org/services/about (accessed March 16, 2018).

Chapman Avenue (approximately 2.3 miles southeast of the project site); and Garden Grove Main Branch located at 11200 Stanford Avenue (approximately 4.9 miles southeast of the project site).

Findings of Fact

a1) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: fire protection?

Less-than-Significant Impact. The proposed Project is not expected to result in any substantial adverse physical impacts associated with the provision of any new or physically altered fire department facilities, the construction of which could cause significant environmental impacts.

The ISO rates fire departments based on assessments of fire damage risk and those ratings are used as a factor in establishing fire insurance premiums. ISO ratings are a numerical grading from one to ten (best to worst). The rating is based on analysis of various fire department elements, including fire-suppression delivery system, fire dispatch, water supply, number of fire hydrants, available equipment, type of training, and personnel. With a Class 2 ISO rating, the GGFD is considered a high-quality fire department.

The Insurance Services Office (ISO) "Field Suppression Rating Schedule" (FSRS) states that "[t]he built-upon area of the fire protection area should have a first-due engine company within 1.5 road miles and a ladder-service company within 2.5 road miles." The distances are based on a formula developed by the RAND Institute and uses the equation:

T = 0.65 + 1.7D

T = travel time in minutes

D = distance in miles

The formula is based on an average 35 miles per hour (mph) road speed and converts to engines 3.2 minutes, ladders 4.9 minutes, and a maximum response distance of 9.15 minutes. In contrast, as indicated in the OCFA's "Standards of Coverage and Deployment Plan" (2014), the OCFA has determined that 30 mph is a more accurate average speed for its service area.

Presented in Figure 32 (City and County Fire Stations in the General Project Area) is a map illustrating those GGFD and OCFA fire stations located within a 1, 1½, 2, and 2½-radius of the proposed Project. (Note that the depicted station location is not intended to be exact.) In addition to GGFD Station Nos. 1, 3, 6, and 7, those OCFA and City of Orange facilities within a 2½-mile radius are described in Table 13 (City and County Fire Stations in the General Project Area). (See also Figure 31 - City of Garden Grove, Orange County Fire Authority, and Garden Grove Fire Department Automatic Aid and Response Area.)

GGFD Station No. 3 (12132 Trask Avenue) is the nearest engine company to the proposed Project. Constructed in 1994, Garden Grove Fire Station No. 3 is located only about 0.01 miles (500 feet) to the northeast of the proposed Project. Operating from Fire Station No. 3 is one paramedic assessment engine company (captain, engineer, firefighter/paramedic and one Office of Emergency Services (OES) engine company). Based on proximity, Fire Station No.

3 would be the first to arrive at the project site in the event of an emergency and would thus be designated as the "first-in" station. GGFD Station No. 1 (11301 Acacia Parkway) is the nearest truck company and is located less than two miles from the proposed Project, and would be designated as the "second-call" station to support Fire Station No. 3.

Based on GGFD's existing stations, apparatus, and deployment, the proposed Project conforms to the ISO standard for distance from both engine and ladder companies. In addition, as further depicted in the OCFA's "Standards of Coverage and Deployment Plan" (2014), as depicted in Figure 33 (Orange County Fire Authority – Number of Ladder Trucks within 10-Minute Travel Time), at least two OCFA truck companies can arrive at the proposed Project within ten minutes.

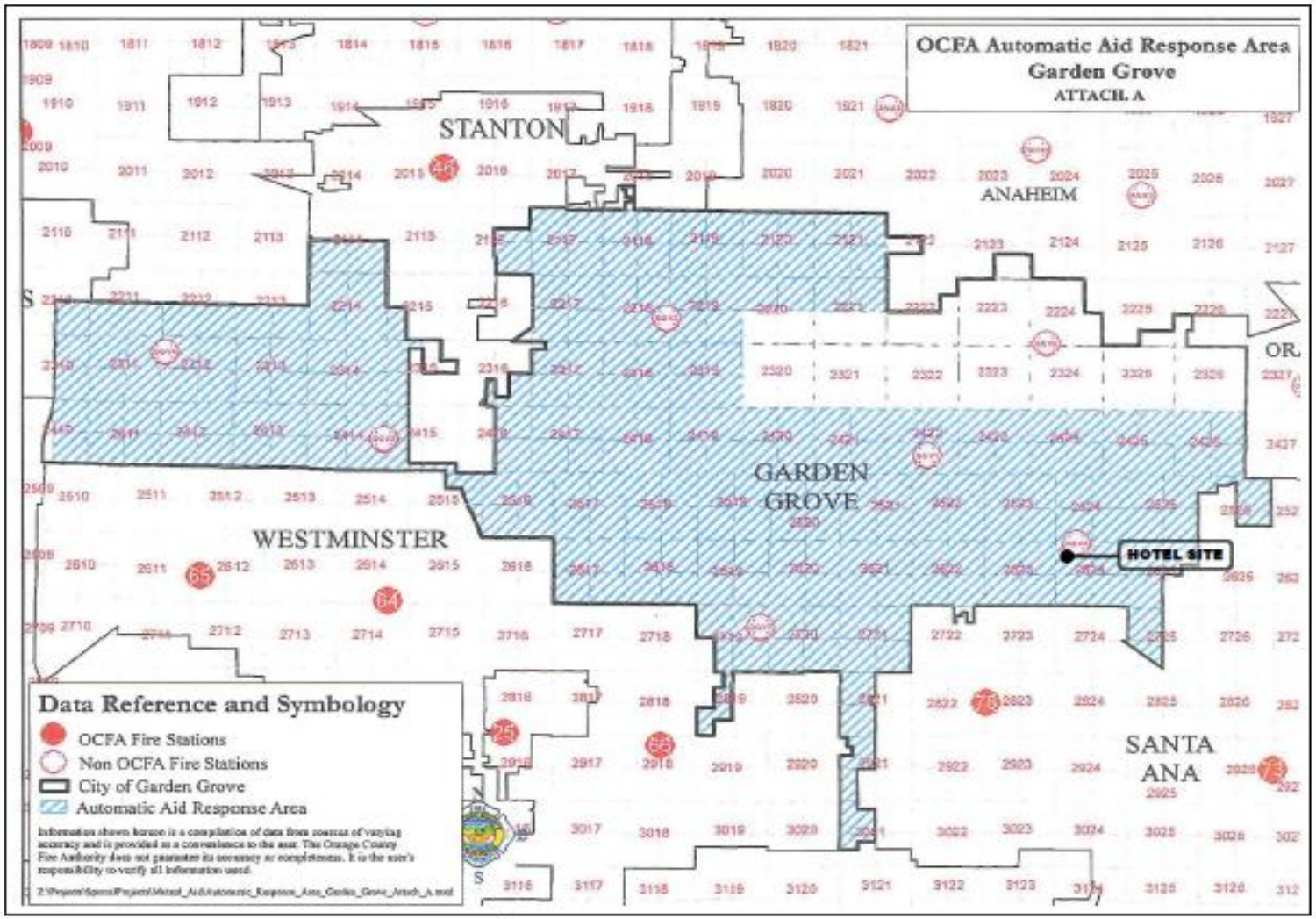


Figure 31 (1 of 2)
CITY OF GARDEN GROVE AND ORANGE COUNTY FIRE AUTHORITY
ORANGE COUNTY FIRE AUTHORITY AUTOMATIC AID RESPONSE AREA
Source: City of Garden Grove/Orange County Fire Authority

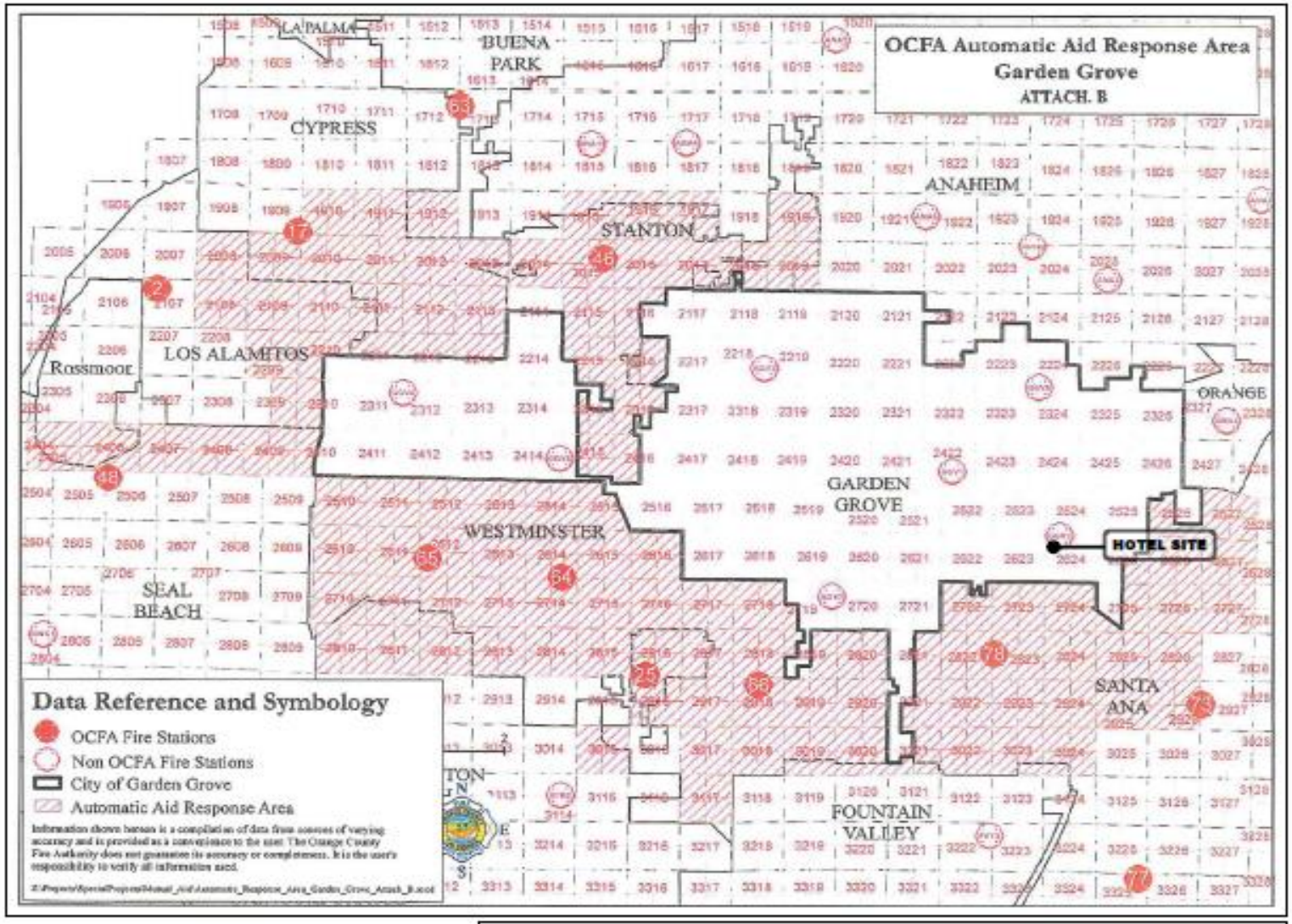
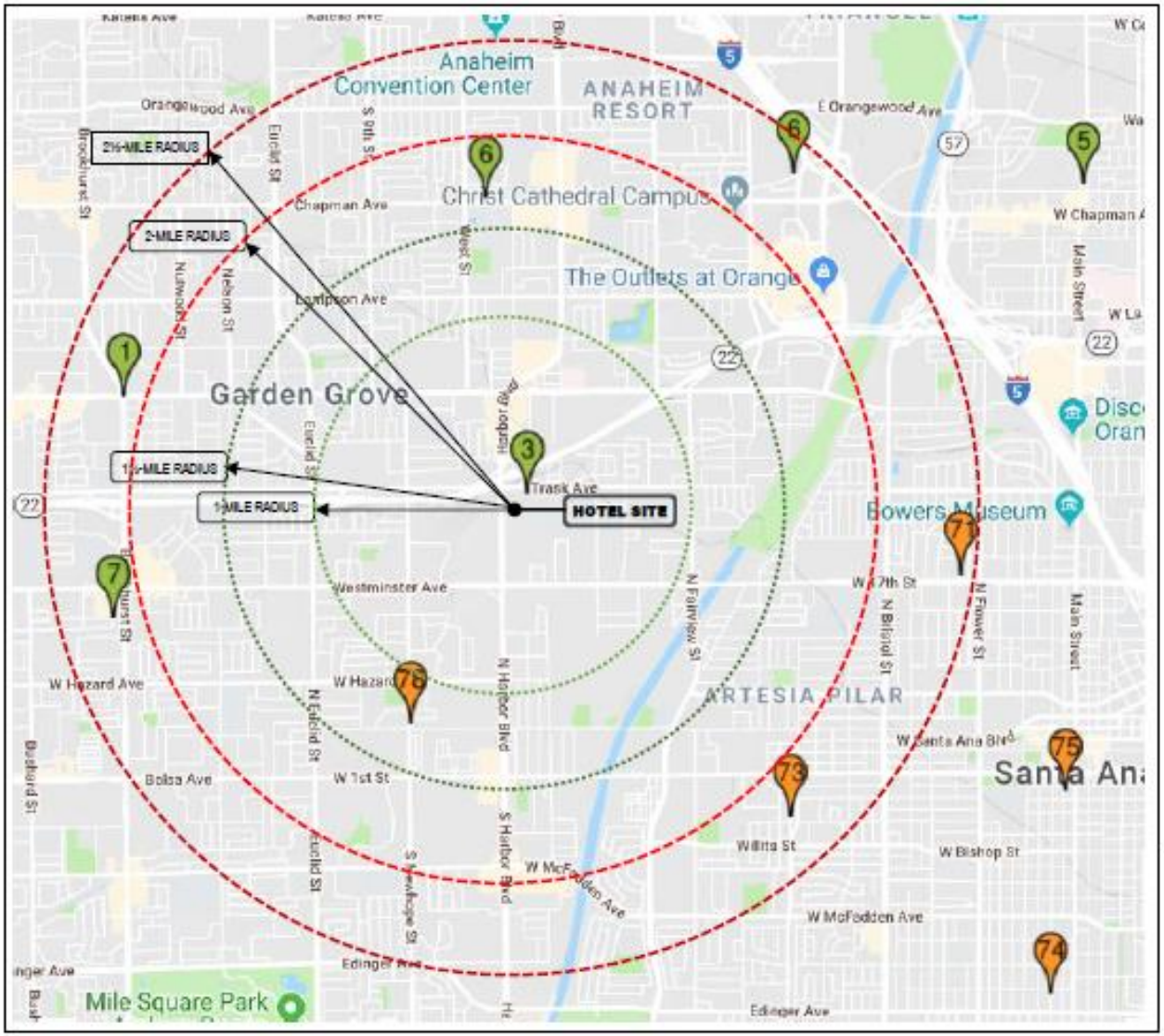


Figure 31 (2 of 2)
CITY OF GARDEN GROVE AND ORANGE COUNTY FIRE AUTHORITY
GARDEN GROVE FIRE DEPARTMENT AUTOMATIC AID RESPONSE AREA
Source: City of Garden Grove/Orange County Fire Authority



Fire Stations:

City of Garden Grove Fire Department

No. 1: 11301 Acacia Parkway
Garden Grove 92840
No. 3: 12132 Trask Avenue
Garden Grove 92840
No. 6: 1211 Chapman Avenue
Garden Grove 92840
No. 7: 14162 Forsyth Lane
Garden Grove 92844

Orange County Fire Authority Division 6, Battalion 9

No. 66: 15601 Moran Street
Westminster 92682
No. 71: 1029 W. 17th Street
Santa Ana 92706
No. 73: 419 S. Franklin Street
Santa Ana 92703
No. 74: 1427 S. Broadway Street
Santa Ana 92707
No. 75: 120 W. Walnut Street'
Santa Ana 92701
No. 78: 501 N. Newhope Street
Santa Ana 92703

City of Orange Fire Department

No. 5: 1345 W. Maple Avenue
Orange 92868
No. 6: 345 The City Drive South
Orange 92868

Figure 32
CITY AND COUNTY FIRE STATIONS IN THE GENERAL PROJECT AREA
Source: Orange County Fire Authority

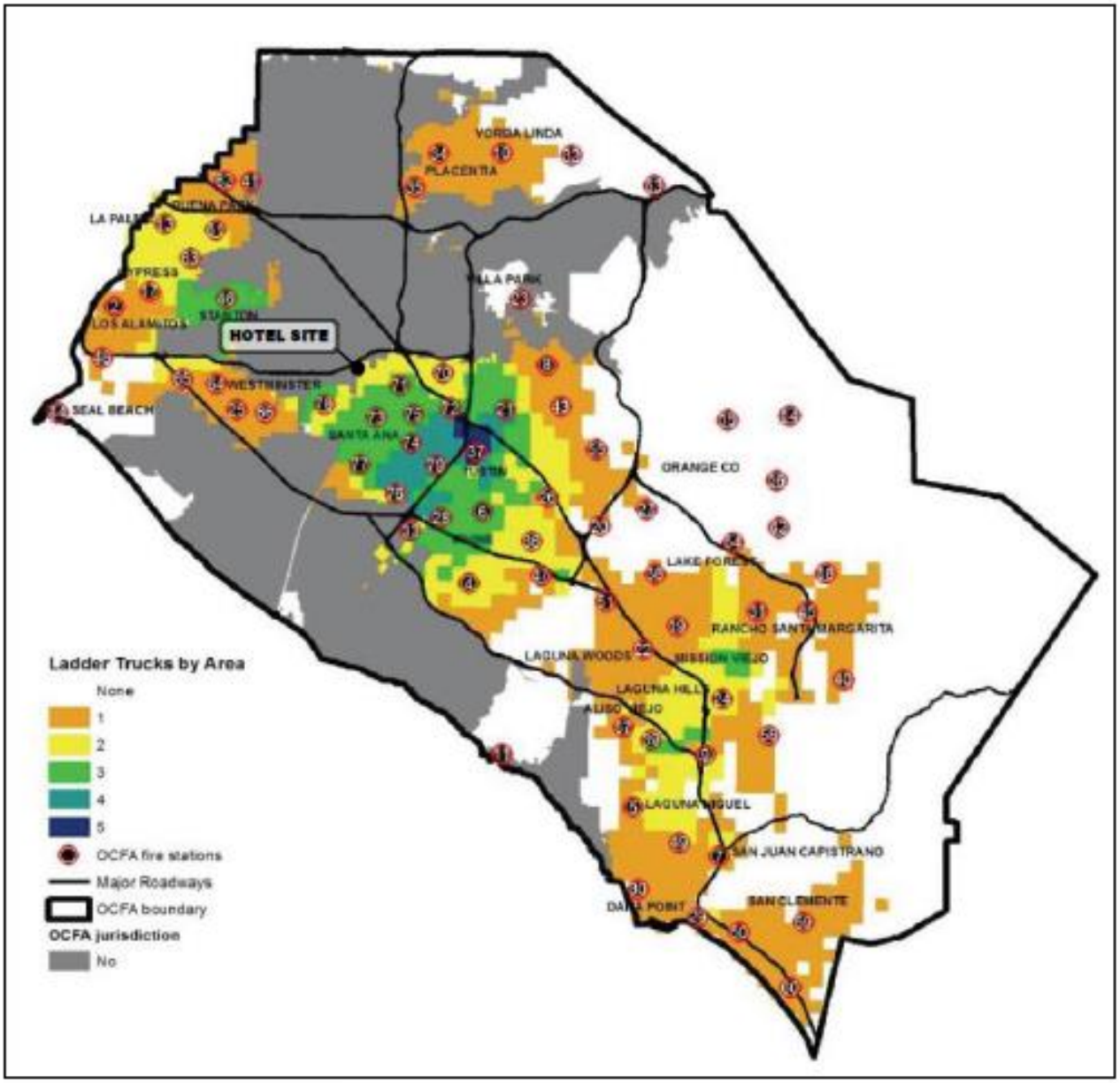


Figure 33
ORANGE COUNTY FIRE AUTHORITY
NUMBER OF LADDER TRUCKS WITHIN 10-MINUTE TRAVEL TIME
Source: Orange County Fire Authority

TABLE 13
CITY AND COUNTY
FIRE STATIONS IN THE GENERAL PROJECT AREA

Station No.	Staffing	Apparatus
City of Garden Grove Fire Department		
Station No. 1 11301 Acacia Parkway Garden Grove 92840	**1 Captain 2 Engineers 4 Firefighters 1 Paramedic**	**Engine 1 Truck Company 1 Air Utility Unit Paramedic Squad**
Station No. 3 12132 Trask Avenue Garden Grove 92840	**1 Captain 1 Engineer 1 Firefighter/Paramedic**	**PAU Engine 3 OES Engine**
Station No. 6 1211 Chapman Avenue Garden Grove 92840	**1 Captain 1 Engineer 1 Firefighter/Paramedic**	**PAU Engine 6**
Station No. 7 14162 Forsyth Lane Garden Grove 92844	**1 Captain 1 Engineer 1 Firefighter/Paramedic**	**PAU Engine 7**
Orange County Fire Authority		
Station No. 71 1029 W. 17th Street Santa Ana, CA 92706	**6 Fire Captains 6 Fire Apparatus Engineers 12 Firefighters**	**Medic Engine 71 Medic Truck 71**
Station No. 73 419 S. Franklin Street Santa Ana, CA 92703	**3 Fire Captains 3 Fire Apparatus Engineers 6 Firefighters**	**Medic Engine 73**
Station No. 78 501 N. Newhope Street Santa Ana, CA 92703	**3 Fire Captains 3 Fire Apparatus Engineers 9 Firefighters**	**Medic Van 78 PAU Engine PAU 78**
City of Orange Fire Department		
Station No. 6 345 The City Drive South Orange, CA 92868	**1 Captain 1 Engineer 1 Firefighters**	**Engine**
Notes: PAU – Paramedic Assessment Unit		

Source: Orange County Fire Authority

As a hotel, the proposed Project would not be anticipated to result in an excessive increase in calls for service. The Project Applicant would be required to comply with all applicable building code requirements requiring fire protection devices such as sprinklers, alarms per the California Fire Code (CFC), adequately spaced fire hydrants, and fire access lanes. Adherence to applicable codes would decrease the demand for fire services and ensure that there is adequate emergency access on site.

Furthermore, the project site is not located within a Fire Hazard Severity Zone on the Statewide Cal Fire Map for the Orange County Region. Although the proposed Project may necessitate additional fire assistance, such a need would be negligible and would not necessitate new or expanded fire protection facilities. Therefore, impacts to fire protection would be less than significant, and no mitigation is required.

a2) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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: police protection?

Less-than-Significant Impact. The proposed Project is not expected to result in any substantial adverse physical impacts associated with the provision of any new or physically altered police facilities, the construction of which could cause significant environmental impacts.

The City of Garden Grove Police Department (GGPD) provides law enforcement services throughout the City. The GGPD operates from a centralized facility located at 11301 Acacia Parkway, approximately 1.2 miles northeast of the project site.

As indicated in the 2008 FPEIR, with regard to the GGPD, from a programmatic perspective, no service shortfall requiring additional personnel or equipment is anticipated as a result of the implementation of the GGGP.

No detailed information on the proposed security measures to be incorporated into the proposed Project has been requested from or provided by the Project Applicant. Typically, hotels provide a variety of measures, including chain locks and dead bolts and one-way viewing mirrors on guest room doors; centralized-video camera systems; 24-hour security patrol on guest room floors; criminal record checks of new employees; printed safety tips on bulletin boards to educate guests about crime prevention; and security instruction for new employees. Those actions can reduce the number of potential incidences and reduce emergency and non-emergency demands on the GGPD.

While the proposed Project may incrementally contribute to Citywide demands for police services, the resulting increase would be less-than-significant. Therefore, operational impacts to police services would be less than significant, and no mitigation would be required.

a3) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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: schools?

Less-than-Significant Impact. The proposed Project is not expected to result in any substantial adverse physical impacts associated with the provision of any new or physically altered school facilities, the construction of which could cause significant environmental impacts.

Because the proposed Project does not have a residential component, project implementation will not result in any direct impacts to the Garden Grove Unified School District (GGUSD); however, new employment opportunities associated with the proposed Project could promote household formation and/or the in-migration of families into the school district's boundaries.

Local school districts are authorized to impose and collect school "impact fees" for all residential and non-residential development activities that occur within their jurisdiction to off-set the additional costs associated with the new students that result directly from the construction of new homes and indirectly from the creation of new employment opportunities. The governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose

of funding the construction or reconstruction of school facilities. The fee that can be imposed by the affected school district can vary based on the type of use proposed. Local school districts are authorized to adjust those fees for inflation every two (even numbered) years, as determined by the State Allocation Board (SAB) at its January meeting.

Section 65995(h) of the California Government Code provides that "[t]he payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995 and, if applicable, any amounts specified in Section 65995.5 or 65995.7 are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities."

As of March 2018, the fees assessed by the GGUSD are $3.79 per square foot for residential development, $0.61 per square foot for the purpose of housing for seniors, and $0.61 per square foot commercial and industrial development. Payment of applicable fees to the GGUSD constitutes full and complete mitigation of project-related impacts on the provision of school facilities. Fees are collected by the City at the time building permits are issued.

As a result, operational impacts to school services would be less than significant, and no mitigation would be required.

a4) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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: parks?

Less-than-Significant Impact. The proposed Project is not expected to result in any substantial adverse physical impacts associated with the provision of any new or physically altered recreational facilities, the construction of which could cause significant environmental impacts.

Non-residential uses typically do not directly impose substantial demands on recreational services and/or park facilities. The proposed Project would provide recreational opportunities on-site including a pool and a gym. Based on the proposed Project's size and the nature of the proposed use, implementation would not be expected, either directly or indirectly, to substantively impact available recreational services and/or proximal recreational facilities.

As a result, operational impacts to park services would be less than significant, and no mitigation would be required.

a5) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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: other public facilities?

No Impact. The proposed Project is not expected to result in any substantial adverse physical impacts associated with the provision of any new or physically altered library or other

governmental facilities, the construction of which could cause significant environmental impacts. The City is a member of the Orange County Public Library (OCPL) system. The OCPL has adopted a standard service ratio of 0.2 square foot of library space and 1.5 volumes per capita to serve residential communities. The OCPL has not adopted a service standard for non-residential land uses.

As discussed previously, development of the proposed Project could result in an increase of new employees in the City. While it is possible that employees may visit library facilities during breaks or after work hours, the impact would not significantly affect OCPL system performance, and would not require the expansion of libraries within the City. Because the proposed Project does not include residential uses, it is unlikely that the implementation would increase demand for library facilities. Therefore, the proposed Project would not impact library services. No mitigation would be required.

Moreover, no additional public facilities would be substantively impacted by the proposed Project. As such, no mitigation would be required.

15. Recreation

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

Findings of Fact

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?

Less-than-Significant Impact*.* According to the City of Garden Grove's Parks, Recreation, and Open Space Element, the City currently maintains 14 parks and uses 5 public schools as additional park facilities through joint-use agreements with the Garden Grove Unified School District (GGUSD), totaling 157.1 acres of parkland throughout the City. Additionally, the Parks, Recreation, and Open Space Element requires the provision of 2 acres of parkland per 1,000 residents.

As discussed in Section 13, Population and Housing, the proposed Project will not cause substantial population growth and, therefore, will not lead to an increase in the use of neighborhood and regional parks. The nearest neighborhood parks are Cesar Chavez Campesino Park (W. 5th Street, Santa Ana) and Twin Lakes Freedom Park (12952 Lampson

Avenue, Garden Grove), located approximately 1.0 mile to the southeast and 1.1 miles to the northeast, respectively. No regional parks are located in proximity to the project site. Due to onsite amenities, hotel guests would not be anticipated to utilize either neighborhood or regional parks to any significant degree.

Public golf courses in the general project area include Willowick Golf Course (3017 W. 5th Street, Santa Ana) and Riverview Golf Course (1800 W. Santa Clara Avenue, Santa Ana), located about 0.6 and 1.2 miles away, respectively. Any minimal increased usage of these facilities attributable to the proposed Project would not be expected to result in any substantial physical deterioration of those facilities.

Overall, the proposed Project does not include any residential uses and, therefore, would not increase the City's population that would utilize parks. While it is possible that hotel guests may visit nearby parks and recreational facilities during their stay, it is unlikely that the temporary use of parks by hotel guests would increase the use of those parks to a level that would contribute to substantial physical deterioration of those facilities.

Therefore, the proposed Project would result in less than significant impacts related to the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and no mitigation would be 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 proposed Project neither includes any public recreational facilities nor, based on the anticipated minimal usage thereof, requires the expansion of any public recreational facilities. Therefore, there would be no impacts related to the construction or expansion of recreational facilities, and no mitigation would be required.

16. Transportation and Traffic

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and free-ways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐

b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	☒	☐

Background Information

In order to assess the project's potential traffic-related impacts, a traffic study was performed as part of this CEQA-compliance effort. The resulting "13650 Harbor Boulevard Hotel Trip Generation Analysis & Traffic Letter" (April 20, 2018) is included in Appendix H (Trip Generation Analysis & Traffic Letter).

The project site is freeway accessible. The eastbound off-ramp of the Garden Grove (SR-22) Freeway is located approximately 600 feet to the north. Access to the eastbound on-ramp is obtained by travelling north on Harbor Boulevard for approximately 600 feet, turning right onto Trask Avenue, and traveling for a distance of approximately 650 feet.

The Anaheim Convention Center (200 S. Anaheim Boulevard, Anaheim) and Disneyland (1313 Disneyland Drive, Anaheim) are located approximately 2.3 and 2.6 miles to the north, respectively.

Findings of Fact

a) Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and free-ways, pedestrian and bicycle paths, and mass transit?

Less-than-Significant Impact*.*

Construction**.** The proposed Project would generate short-term construction-related vehicle trips from construction workers and delivery of construction vehicles. Vehicle trips that would be generated on a daily basis throughout each phase of construction would derive from

construction workers and delivery of construction materials. All construction equipment, including construction worker vehicles, would be staged on the project site for the duration of the construction period. In addition, the proposed Project construction schedule would comply with the City Municipal Code Chapter 8.47, which limits construction activities to the hours between 7:00 a.m. and 10:00 p.m. when the project site is within a residential area or within 500 ft of a residential area. Any construction-related vehicle trips, however, would be temporary because construction is scheduled for only 226 days.

The proposed Project would not conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, construction impacts are less than significant, and no mitigation is required.

Operation. The traffic impacts of the proposed Project during the a.m. peak hour and p.m. peak hour were evaluated based on a comparison between the existing and future operating conditions on the project site. Vehicle trips to and from the project site were calculated for the existing and with-project conditions using trip rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition (2017). The proposed Project is anticipated to increase annual daily traffic (ADT) (i.e., number of vehicles entering and leaving the project site daily) by 558 trips and total peak hour trips (i.e., number of vehicles entering and leaving the project site during peak hours) by 25 trips in the a.m. peak hour and by 32 trips in the p.m. peak hour. (See Appendix H.) Due to the low vehicle trips associated with project implementation,[25] operational traffic impacts would be less than significant, and no mitigation is required.

b) Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?

No Impact. As indicated in the OCTA's "2017 Orange County Congestion Management Program" (October 2017) (CMP) the Garden Grove (SR-22) Freeway westbound ramp at Harbor Boulevard is identified as a "CMP intersection" and potential subject thereto.

The CMP notes that projects whose traffic impact falls below a specified threshold do not require compliance. As noted: "A TIA [Traffic Impact Analysis] will be required for CMP [Congestion Management Plan] purposes for all proposed developments generating 2,400 or more daily trips. For developments which will directly access a CMP Highway System link, the threshold for requiring a TIA should be reduced to 1,600 or more trips per day." Because the proposed Project's projected number of daily trips falls (558 trips) below that threshold, a TIA is not required. Therefore, the proposed Project would not conflict with an applicable congestion management program.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The nearest airports to the project site include: (1) John Wayne Airport – Orange County Airport (SNA) (located approximately 6.3 miles to the southeast); (2) Los Alamitos

[25] According to the City of Garden Grove's Traffic Engineering Policy TE 18, Traffic Study Requirements for Development, a traffic study is required for proposed developments that would generate 50 or more vehicle trips during the a.m. or p.m. peak hour.

Army Airfield Airport (SLI) (located approximately 6.9 miles to the west); and (3) Fullerton Municipal Airport (FUL) (located approximately 8.2 miles to the northeast). The proposed project site is not within the Federal Air Regulations (FAR) Part 77 Notification Area for any of these airports, and thus, the proposed Project would have no impact on air traffic patterns.

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

No Impact. The proposed Project would not introduce any new roadways or introduce a land use that would conflict with the existing urban land uses in the surrounding area. The proposed Project does not require any modifications to existing roads or intersections. Therefore, the proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

e) Would the project result in inadequate emergency access?

Less-than-Significant Impact. Access to and along Harbor Boulevard will be maintained during the construction and subsequent operation of the proposed Project hotel project. During project construction, temporary lane closures would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014). Among other things, the manual recommends early coordination with affected agencies to ensure that emergency vehicle access is maintained.

Pursuant to the City's standard conditions of approval, the Project Applicant would be required to prepare a Construction Staging and Traffic Management Plan (CSTMP) to ensure that emergency vehicles would be able to navigate through streets adjacent to the project site that may experience congestion due to construction activities. Traffic management personnel (flag persons), required as part of the CSTMP, would be trained to assist in an emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. The CSTMP would also require certain conditions (e.g., providing warning signs, lights, and devices) and would require that the City of Garden Grove Police Department be notified a minimum of 24 hours in advance of any lane closures or roadway work. Maintaining unrestricted access during construction will minimize potential traffic conflicts along designated and undesignated evacuation routes and would avoid any potential interference with any City or County emergency response plans.

For operational purposes, emergency access to the project site would be provided by Harbor Boulevard. Access to/from the site must be designed to City standards and would be subject to review by the Garden Grove Fire Department and the Garden Grove Police Department for compliance with fire and emergency access standards and requirements. Therefore, approval of the project plans would ensure that the proposed Project's impacts related to emergency access would be less than significant, and no mitigation is required.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

Less-than-Significant Impact. Because the proposed Project is a hotel, it is anticipated to nominally increase bus ridership. The proposed Project is not, however, of a scale that would meaningfully affect public transit, train ridership, or other forms of non-motorized transportation. The proposed Project would not affect existing transit service (i.e., bus stops

or routes), or conflict with adopted programs, plans, or policies regarding public transit, bicycle, or pedestrian facilities, or otherwise degrade the performance or safety of such facilities. Congestion could increase during construction, but any such congestion would be temporary. During operation, project-related traffic would be incrementally greater than existing conditions but would not result significant unavoidable impacts on transportation facilities within the project vicinity. Therefore, impacts are considered less than significant, and no mitigation is required.

17. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in PRC Section 5020.1 or	☐	☒	☐	☐
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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Background

The City lies within a broader region described as being located with the “crossroads” shared in the 1700s and 1800s by three indigenous cultures, including the Juaneño, the Gabrieliño, and the Luiseño. The name "Juaneño" derives from the Spanish Mission San Juan Capistrano, founded in 1776. In the 20th century, the Juaneño organized as the Juaneño Band of Mission Indians, Acjachemen Nation, which is recognized by the State but not the federal government.

The name “Luiseño” derives from the Mission San Luís Rey de Francia, founded in 1798. The “Luiseño” presently consist of six federally-recognized bands in southern California, including the La Jolla, Pala, Pauma, Pechanga, Rincon, and Soboba.

Once the Misión San Gabriel Arcángel (San Gabriel Mission) was built in 1771, the Native Americans living in or subsequently congregated in that area were referred to as the “Gabrielino” (Tongva) a name derived from the mission with which they were associated. In the “Handbook

of the Indians of California" (Smithsonian Institution Bureau of American Ethnology, Bulletin 78, 1925), Alfred L. Kroeber states that "Aliso Creek is cited as the boundary between the "Gabrielino" and the "Luiseño."

Of those three Native American cultures, only representatives of the Gabrieliño Band of Mission Indians, Kitz Nation responded to the City's invitation for tribal consultation.

In prior CEQA-related consultations with representative of the Kizh Nation, tribal representatives indicated that other proximal areas within the City (e.g., 12111 Buaro Street, Garden Grove) were located within the ancestral territories of the Kizh people. As indicated in he "Initial Study/Mitigated Negative Declaration – 12111 Buaro Street Project" (August 2017), on June 15, 2017 representatives of the City and "Andrew Salas and Matthew Teutimez, from the Gabrieleno Band of Mission Indians - Kizh Nation, conducted consultation via the telephone. As a result of this conversation, the City was informed that Harbor Boulevard […] was considered a pre-historic trading route, and that artifacts and human remains may be beneath the surface at the project site."

Although unspecified, it is likely the reference to Harbor Boulevard as a "pre-historic trading route" may relate to that portion of Harbor Boulevard located to the north of the Santa Ana (I-5) Freeway (formerly U.S. Route 101) whose existing alignment is associated with "El Camino Real," the historic road connecting former Alta California's 21 Spanish missions.

Culture History of the Gabrieleño

Although the first recorded contact between the Gabrieliño and Europeans occurred in 1542 when the Juan Cabrillo expedition arrived at Santa Catalina Island, the historic period in southern California is generally accepted as beginning in 1769 when the Gaspar de Portolá expedition crossed the coastal region. The Portolá expedition established the first Alta California Mission, San Diego de Alcalá, which was founded on July 16, 1769. The first mission to be established in Gabrieliño territory was the Franciscan Misión San Gabriel Arcángel, founded September 8, 1771.

When Juan Cabrillo sailed the coast of California in 1542, Los Angeles and most of Orange County were inhabited by prehistoric people who occupied scattered villages. Although these people had no political institutions beyond the village level, they spoke a common dialect, and when the Mission San Gabriel was established, came to be known to the Spanish as "Gabrieliño."

Linguistic and archaeological evidence strongly suggest that the Gabrieliño represented a branch of desert dwellers, or Shoshoneans, who moved to coastal southern California during the first millennium A.D. At that time, they supplanted or absorbed an earlier group about which relatively little is known.

The Gabrieleño were a stone-age people whose subsistence was based upon hunting and gathering. They did not know metallurgy nor did they practice agriculture. Yet, the population was relatively small, few villages comprising more than 100 people, and agriculture was unnecessary. Technology was comprised principally by the manufacture of tools and containers from stone, bone, leather, and plant fiber. Most implements requiring a hard, sharp edge were manufactured from chipped stone. Implements for milling, such as manos, metates, mortars and pestles were made from groundstone. Traditional containers consisted of finely woven baskets that were lined with tar when waterproofing was required. Pottery was also known during the final centuries of Gabrieliño prehistory although it seems that baskets never lost their prominent role in daily lives.

Villages in the general project area included, but may not have been limited to, “Pasbengua” (alternative spelling “Pasbenga”) and “Hotuuknga” (alternative spellings or different villages include “Hutucgna” and “Hutuukuga,”). In 1852, Hugo Reid reported that the community of “Hotuuknga” was located on “Santa Ana,” referencing the Mexican land grant of “Rancho Santiago de Santa Ana.” “Hotuuknga” was identified as being situated on the north bank of the Santa Ana River, downstream of Santa Ana Canyon.

Robert Heizer’s “Alexander Taylor’s Map of California Indian Tribes, 1864” (California Historic Society Quarterly, June 1941, Vol. XX, No. 2, pp. 171-180) placed the settlement of “Pasbengna” along the Santa Ana River in the vicinity of the City of Santa Ana. The name was derived from brea (tar or pitch) and was given to the place because there used to be mineral oil resources located there.

Findings of Fact

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

(a) Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

(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 PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

***Less-than-Significant Impact with Mitigation Incorporated*.** The following responses address the thresholds in (a) and (b) above.

As mandated under SB 18 (Chapter 905, Statutes of 2004) and Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) (Section 21080.3.1, CEQA), certain consultation requirements apply when adopting or amending general plans. Prior to the adoption of or a “substantial amendment” to a general plan, the Lead Agency must refer the proposed action to those tribes on the Native American Heritage Commission’s (NAHC) contact list and have traditional lands located within the City’s jurisdiction. The referral must allow a 45-day comment period (Government Code § 65352).

The principal objective of SB 18 is the preservation and protection of “cultural places” of California Native Americans, as defined in Sections 5097.9 and 5097.993 of the Public Resources Code. Prior to the adoption or amendment of a general plan, the local government must: (1) notify the appropriate California Native American tribe of the opportunity to conduct consultation for the purpose of preserving or mitigating impacts to cultural places; (2) refer the proposed action to those tribes that are on the NAHC contact list that have traditional lands within the agency’s jurisdiction; and (3) send notice of a public hearing to tribes that have filed a written request for such notice.

Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, 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 (California Register) or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

Also per AB 52 (specifically Public Resources Code [PRC] 21080.3.1), Native American consultation is required upon request by any California Native American tribe that has previously requested that the City provide it with notice of such projects.

As specified in the OPR's "Tribal Consultation Guidelines": "Effective consultation is an ongoing process, not a single event. The process should focus on identifying issues of concern to tribes pertinent to the cultural place(s) at issue – including cultural values, religious beliefs, traditional practices, and laws protecting California Native American cultural sites – and on defining the full range of acceptable ways in which a local government can accommodate tribal concerns." During consultation, consistent with the requirements of Government Code Sections 6244(r) and 6254.10, lead agencies must follow certain confidentiality requirements concerning tribal cultural resources. Specifically, absent written consent, any information submitted by a tribe during the consultation process may not be included in the project's CEQA document or otherwise disclosed to the public.

Consultation ends when: (1) if significant effects exist, the lead agency agrees to incorporate the mitigation requested by the tribe into the CEQA document: or (2) the tribe or the lead agency, acting in good faith and after reasonable effort, concludes that agreement cannot be reached. If no agreement is reached, the lead agency must so state in the environmental document and must still consider feasible mitigation based on the standards in the statute.

In compliance with SB 18 and AB 52, the City submitted a "local government tribal consultation list request" for a project identified therein as "Hotel Project Home2 Suites – 13650 Harbor Boulevard" and described as a "1.48-acre project located on the east side of Harbor Boulevard southerly of the intersection of Harbor Boulevard and Trask Avenue, and northerly of the intersection of Harbor Boulevard and Westminster Street." In correspondence dated September 27, 2017, the NAHC responded and provided a list of appropriate tribal contacts.

On October 4, 2017, through written correspondence, the City provided government-to-government notification to those tribal contacts identified by the NAHC. Of the six Native American representatives contacted, only the "Gabrieleńo Band of Mission Indians, Kizh Nation" (Kizh Nation) responded. On October 10, 2017, the Kizh Nation submitted a "written request for consultation" regarding the "Heavy Commercial land use designation located on the east side of Harbor Boulevard and Trask Avenue."

The Gabrieleno Band of Mission Indians – Kizh Nation did not respond to the City's attempts to consult pursuant to AB 52. Finally, on May 30, 2018, the City sent a letter to Chairman Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation. The letter recognized that on prior projects within the City, the City and the Gabrieleno Band of Mission Indians – Kizh Nation agreed to a mitigation measure requiring Native American monitoring of all ground disturbance. The letter provided the language of the past mitigation measure, and asked for a response confirming or objecting to the incorporation of the same mitigation measure in the

initial study for this project. The City has received no response to its May 30, 2018 letter. (See Appendix I.)

Based, in part, on the extensive disturbance to the general project site associated with prior development activities, including the channelization of the East Garden Grove-Wintersburg Channel (CO5), located adjacent to the project site, the construction of Garden Grove Mazda, and the demolition and removal of those facilities associated with the site's former use, the City is not in possession of any "substantial evidence" that any tribal cultural resources currently exist or previously existed on the project site.

As discussed in Cultural Resources, the property does not meet any of the California Register criteria and the existing buildings on the project site do not qualify as "historical resources" as defined by CEQA. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines* or Public Resources Code 5020.1(k).

Also discussed in Cultural Resources, there is little potential for the proposed Project to impact prehistoric resources due to significant prior disturbance from past grading and development activities. In the unlikely event archaeological resources are discovered at any time during construction, those activities would be halted in the vicinity of the find until they can be assessed for significance by a qualified archaeologist (Mitigation Measure CUL-1). Implementation of Mitigation Measure CUL-1 would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

In an abundance of caution, the City has agreed to require Native American monitoring during ground-disturbing activities in native soil. As such, the proposed Project would be required to adhere to Mitigation Measure TCR-1, which would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level. Therefore, on this basis, the City has concluded that, with implementation of Mitigation Measure TCR-1, potential impacts related to unknown buried tribal cultural resources would be reduced below a level of significance.

> **TCR-1 Tribal Cultural Resources: Monitoring Procedures.** Prior to commencement of any grubbing or grading activities, the Project Applicant shall present evidence to the City Director of the Economic and Community Development Department, or designee, that a qualified Native American monitor has been retained to provide Native American monitoring services for any construction activities that may disturb native soils. The Native American monitor shall be selected by the Project Applicant from the list of certified Native American monitors maintained by the Gabrieleno Band of Mission Indians – Kizh Nation. The Native American monitor shall be present at the pre-grading conference to establish procedures for tribal cultural resource surveillance. Those procedures shall include provisions for temporarily halting or redirecting work to permit sampling, identification, and evaluation of resources deemed by the Native American monitor to be tribal cultural resources as defined in Public Resources Code Section 21074. These procedures shall be reviewed and approved by the City Director of the Economic and Community Development Department, or designee, prior to commencement of any surface disturbance on the project site. If prehistoric cultural resources are recovered, all tribal groups participating in the monitoring shall have input as to treatment, and all materials will be reburied on site at a location deep enough not to be disturbed in the future. Native American

monitoring shall cease if bedrock or loose sediments that can be demonstrated to be more than 10,000 years old are encountered.

18. Utilities and Service Systems

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

Findings of Fact

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Boards?

Less-than-Significant Impact. The Garden Grove Sanitary District (GGSD) is the agency responsible for the refuse and sewer utilities in the City and some areas outside the City's corporate boundaries. The GGSD contracts out residential refuse collection while sewer operations are maintained by the Water Services Division of the City of Garden Grove Public Works Department. The GGSD provides wastewater collection service to approximately 31,200 residential customers and 3,100 commercial, industrial, and other customers. (See Figure 42 - Garden Grove Sanitation District Existing Sewer System and Tributaries [2012].)

The current service area of the GGSD consists of all lands within the district's corporate boundaries (11,584 acres) and several unincorporated Orange County areas contiguous with the district's boundaries (451 acres). The GGSD maintains and serves over 312 miles of sewer lines, 9,700 manholes, and four lift station located throughout the City. The Cities of Anaheim, Orange, Stanton and Santa Ana and the Midway City Sanitary District tie into the GGSD's sewer system.

In Order No. 2006-0003 (Statewide General Waste Discharge Requirements for Sanitary Sewer Systems) (May 2, 2006), the State Water Resource Control Board (SWRCB) established requirements for the preparation of a "Sewer System Management Plan" (SSMP). Pursuant to that Order, the GGSD "shall develop and implement a written Sewer System Management Plan and make it available to the State and/or Regional Water Boards upon request." The stated goal of the SSMP, "is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system."

In August 2016, the GGSD prepared a "Sewer System Management Plan" (GGSD-SSMP) which, among other things, identified capacity deficiencies within the GGSD's sewer system through hydraulic analysis. Those sewers identified as deficient were categorized into three categories: verified deficiency (PDWF d/D >0.62), minimal capacity (PDWF d/D between 0.50 and 0.62), and calculated deficiency (PDWF d/D <0.50). PDWF represents peak dry weather flow, d represents depth of flow and D represents pipe diameter. Sewers shall be sized so the depth of the PDWF, projected for the design period, shall be no more than one-half the pipe diameter (d/D = 0.5). The analytical methodology presented in the GGSD-SSMP.

Presented in Figure 44 (Garden Grove Sanitation District Collection System Hydraulic Deficiencies [2016]) is that portion of the Citywide analysis wherein the proposed Project is located. As indicated, the general project area does not have a verified deficiency, minimal capacity, and/or a calculated deficiency.

Based on the GGSD's generation rates for general commercial uses (125 gallons of wastewater per day per each 1,000 square feet), the 17,216 square feet of development associated with the site's former use generated a daily flow of approximately 2,150 gallons per day (gpd). In comparison, based on the GGSD's generation rate for hotels (150 gpd per each room), the proposed 124-room hotel project would generate about 18,600 gpd, resulting in a net increase of 16,450 gallons of wastewater per day. The proposed Project will connect to an existing sewer line within the Harbor Boulevard right-of-way. The existing sewer lines have sufficient capacity to accommodate the projected flows.

Once wastewater passes through the City's sewer system, the Orange County Sanitation District (OCSD) is responsible for treatment and disposal. Because OCSD is a Publicly Owned Treatment Works (POTW), flows treated and discharged by OCSD must comply with applicable Waste Discharge Requirements (WDRs). The WDRs ensure that wastewater discharges from the proposed Project which are treated at OCSD will not exceed applicable wastewater treatment requirements.

OCSD operates two treatment facilities in Fountain Valley (Reclamation Plant No. 1) and Huntington Beach (Reclamation Plant No. 2). Average flows for Plant No. 1 and Plant No. 2 are 117 million gallons per day (mgd) and 67 mgd, respectively. Plant No. 1 has a design capacity of 320 mgd, and Plant No. 2 has a design capacity of 312 mgd. Given current flows, the available capacity at Plant No. 1 is approximately 203 mgd and 245 mgd. The proposed Project's contribution of 16,450 gallons of wastewater per day (or 0.01645 mgd) is well within

the design capacity of either Plant No. 1 or Plant No. 2. Further, as a commercial use, the proposed Project is not of a nature that would be expected to contribute effluent to the sewer system and treatment facilities that would result in an exceedance of wastewater treatment requirements such as an industrial user subject to an industrial wastewater discharge permit. Therefore, impacts related to wastewater treatment requirements would be less than significant, and no mitigation is required.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less-than-Significant Impact*.*

Water**.** The City's main sources of water supply are groundwater from the Lower Santa Ana River Groundwater Basin and imported water from the Metropolitan Water District of Southern California provided by the Municipal Water District of Orange County. Today, the City relies on 70 percent groundwater and 30 percent imported water. It is projected that by 2040, the water supply mix will remain roughly the same. The imported water is treated at both the Robert B. Diemer Filtration Plant located north of Yorba Linda and the F.E. Weymouth Treatment Plant in the City of La Verne.

Delivery of domestic water service in the City is provided by the Water Services Division of the City's Public Works Department. The Water Services Division is responsible for maintaining the wells, reservoirs, import water connections, and the distribution systems that deliver water throughout the City. To meet its infrastructure needs, the Water Services Division collaborates with other jurisdictions, agencies, and service providers, as required.

The City's water supply system provides reliable service to a population of nearly 176,649 within the service area. According to the City's 2015 Urban Water Management Plan (2016), the City consumed approximately 24,049 acre-feet (af) in 2015, and the projected water demand for 2020 and 2040 are 24,078 af and 26,055 af per year, respectively. According to the 2015 Urban Water Management Plan, the City's water supplies are projected to meet full service demands.

According to the City's 2015 Urban Water Management Plan, the City's available water supply will meet the future projected demand because the City has entitlements to receive imported water from the Metropolitan Water District and also has significant water reserves from local groundwater supplies. The City would have adequate water supplies to meet full service demands following project implementation. As such, the proposed Project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the increased demand for potable water. Construction and operation of the proposed Project would not require, nor would it result in, the construction of new water facilities or the expansion of existing water facilities. As a result, the potential impacts related to the construction of water facilities are less than significant, and no mitigation is required.

Wastewater**.** OCSD's service area consists of eleven trunk sewer systems that are located throughout 479-square miles of service area. The trunk sewer systems includes 406-mile long regional interceptor and trunk sewers, 28 miles of force mains, 15 off-site pumping facilities, and the 176-mile long local sewer system. Sewage flows originating from the general project area are transported, via OCSD trunk sewer lines, to OCSD for treatment. Average flows for Plant No. 1 and Plant No. 2 are 117 million gallons per day (mgd) and 67 mgd, respectively.

Plant No. 1 has a design capacity of 320 mgd, and Plant No. 2 has a design capacity of 312 mgd. Given current flows, the available capacity at Plant No. 1 is approximately 203 mgd and 245 mgd. The proposed Project's contribution of 16,450 gallons of wastewater per day (or 0.01645 mgd) is well within the design capacity of either Plant No. 1 or Plant No. 2.

Therefore, construction and operation of the proposed Project would not require, nor would it result in, the construction of new wastewater treatment or collection facilities or the expansion of existing facilities. As a result, the potential impacts related to the construction of wastewater treatment or collection facilities are less than significant, and no mitigation is required.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less-than-Significant Impact*.* The City is a co-permittee on the North Orange County MS4 Permit issued by the Santa Ana RWQCB pursuant to the NPDES program under Section 402(p) of the federal Clean Water Act. The MS4 Permit regulates urban stormwater runoff, surface runoff, and drainage that flow into the MS4 system. The City's stormwater drainage system flows into facilities that are owned, operated, and maintained by the Orange County Flood Control District. In compliance with the MS4 Permit, the City is responsible for regulating inflows to and discharges from its municipal storm drainage system. Specifically, the City's Public Works/Environmental Compliance Division is charged with the task of ensuring the implementation of the MS4 Permit requirements within the City.

The project site was formerly operated as Garden Grove Mazda. Based, in part, on the need to maximize the area available for vehicle display, only about 1,800 square feet (0.3 percent) of the site was landscaped. As proposed, a total of 10,168 square feet of "soft scape" and "setback landscape area" (15.6 percent) of the property will include pervious surface areas. As a result, more rainwater will directly permeate into the groundwater basin and less rainwater will be discharged to the storm drain system from the project site. Because the quantity of water discharged to the storm drain system will be reduced, the proposed Project does not predicate the need for improvements to the storm water system. Therefore, impacts are less than significant, and no mitigation is required.

d) Would the project have sufficient reliable water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less-than-Significant Impact*.* As described in detail in section b) above, the "2015 Urban Water Management Plan, Final" (June 2015) states that, "The City is capable of meeting all customers' demands with significant reserves held by Metropolitan [Water District of Southern California], local groundwater supplies, and conservation in multiple dry years from 2020 through 2040 with a demand increase of six percent from normal demand with significant reserves held by Metropolitan, local groundwater supplies, and conservation" (Section 3.6.5). Therefore, as explained in detail in section b) above, impacts related to water supplies would be less than significant, and no mitigation is required.

e) Would the project result in a determination by the wastewater treatment provider which serves 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 indicted in the GGSD's "2001 Sanitary District Master Plan" (updated November 1, 2011) an existing truck sewer line exists within the Harbor Boulevard right-of-way. No "capacity deficiency" is noted with regard to that sewer line. All connections and other improvements thereto will be conducted in compliance with the GGSD's "Garden Grove Sanitary District Design Criteria for Sewer Facilities" (2015).

As explained in detail above, the project-related increase in wastewater generation can be accommodated within the existing design capacity of the treatment plants that currently serve the City. Therefore, impacts related to wastewater generation are less than significant, and no mitigation is required.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less-than-Significant Impact*.* The project site is located within OC Waste & Recycling's (OCWR) service area. OCWR administers the countywide Integrated Waste Management Plan. OCWR owns and operates three active landfills (i.e., the Olinda Alpha Landfill in Brea, the Frank R. Bowerman Landfill in Irvine, and the Prima Deshecha Landfill in San Juan Capistrano), as well as four household hazardous waste collection centers. All three landfills are permitted as Class III landfills. Class III landfills accept all types of nonhazardous municipal solid waste for disposal.[26]

Within the City, collection of solid waste is contracted to Republic Services. Republic Services collects solid waste, green waste (e.g., grass clippings and tree and shrub clippings), and items for recycling.

Olinda Alpha Landfill at 1942 North Valencia Avenue in Brea is the closest OCWR landfill to the project site and would provide waste disposal for the proposed Project once operational. This landfill is permitted to accept up to 8,000 tons per day (tpd) of solid waste and currently accepts a daily average of approximately 7,000 tpd. The anticipated closure date for the landfill is 2030, when the landfill reaches its full capacity. Non-hazardous waste from project construction activities would be recycled to the extent feasible, and where necessary, would be disposed of at the Olinda Alpha Landfill. Construction waste is anticipated to be minimal compared to waste generated throughout the lifetime of the project during project operation.

Solid waste generated by the proposed Project would not cause the capacity of the Olinda Alpha Landfill to be exceeded. Therefore, the proposed Project would have a less than significant impact effect on solid waste and landfill facilities, and no mitigation is required.

[26] Orange County Waste and Recycling. Landfill Information. Website: http://oclandfills.com/landfill (accessed August 22, 2018).

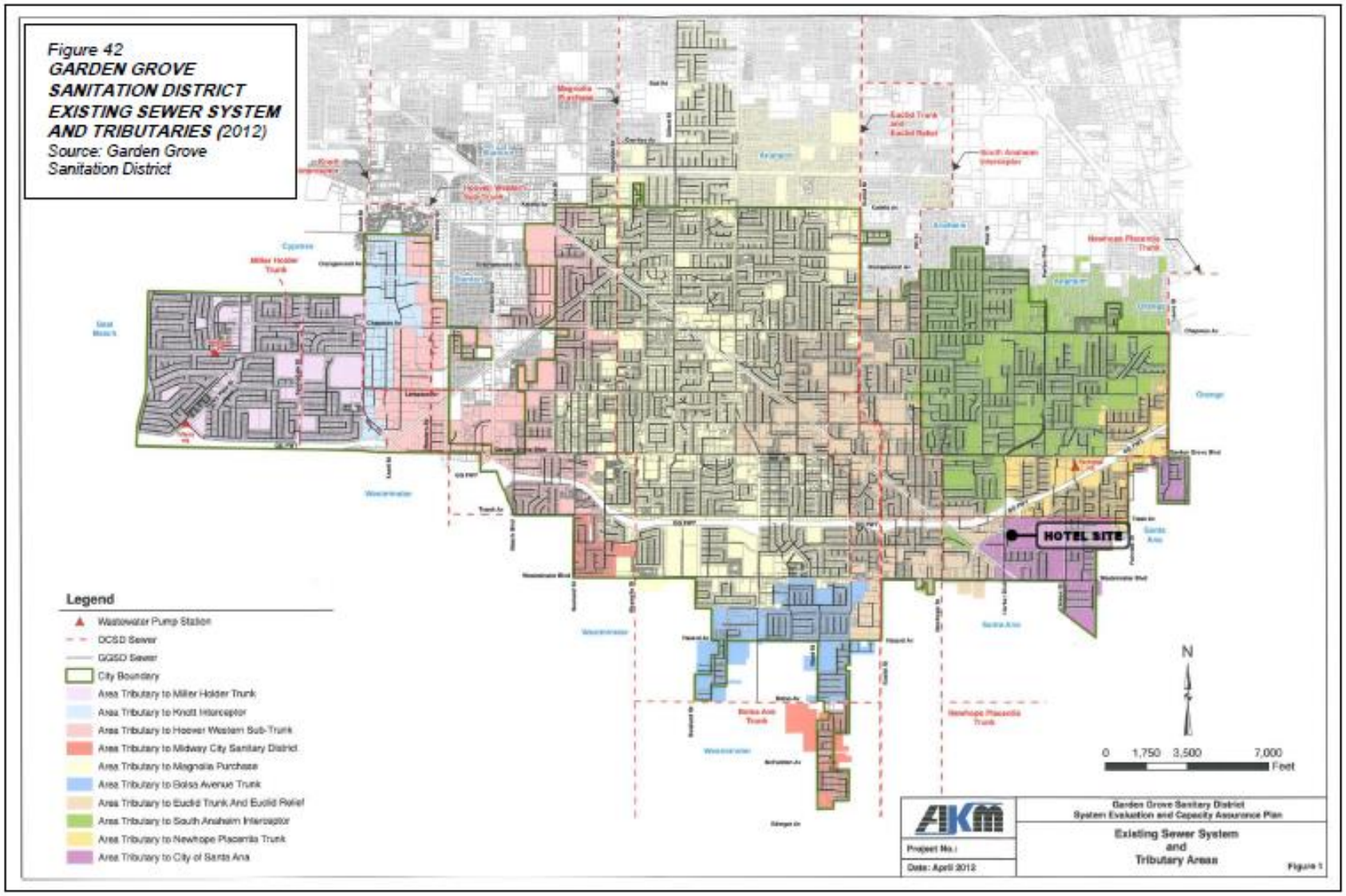
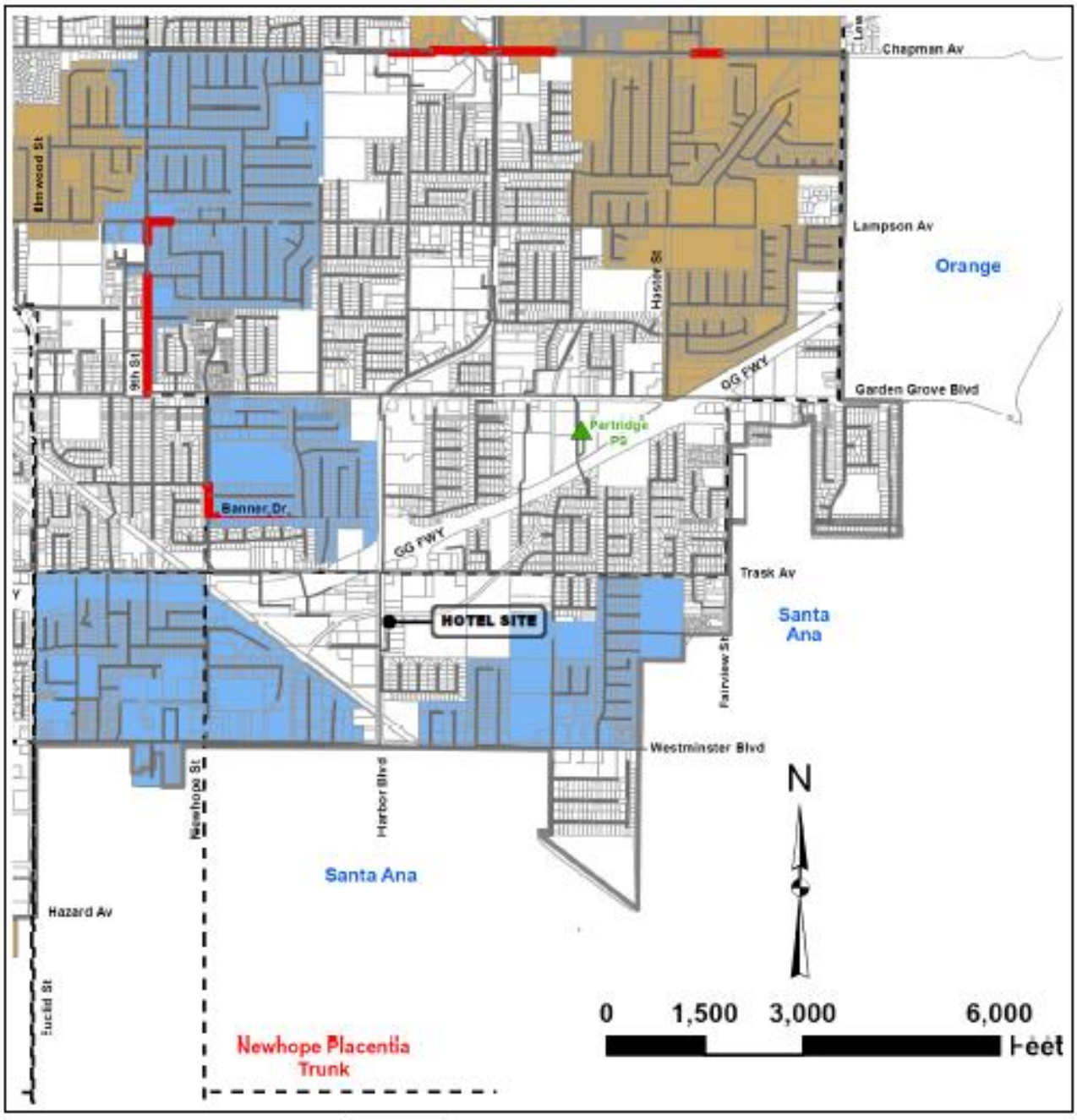


Figure 42
GARDEN GROVE
SANITATION DISTRICT
EXISTING SEWER SYSTEM
AND TRIBUTARIES (2012)
Source: Garden Grove
Sanitation District
HOTEL SITE
Legend
Wastewater Pump Station
OCSD Sewer
GGSD Sewer
City Boundary
Area Tributary to Miller Holder Trunk
Area Tributary to Knott Interceptor
Area Tributary to Hoover Western Sub-Trunk
Area Tributary to Midway City Sanitary District
Area Tributary to Magnolia Purchase
Area Tributary to Bolsa Avenue Trunk
Area Tributary to Euclid Trunk And Euclid Relief
Area Tributary to South Anaheim Interceptor
Area Tributary to Newhope Placentia Trunk
Area Tributary to City of Santa Ana
N
0 1,750 3,500 7,000
Feet
AKM
Garden Grove Sanitary District
System Evaluation and Capacity Assurance Plan
Existing Sewer System
and
Tributary Areas
Project No.:
Date: April 2012
Figure 1



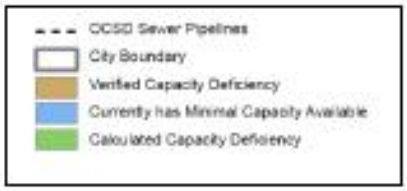


Figure 44
***GARDEN GROVE SANITATION DISTRICT COLLECTION SYSTEM HYDRAULIC DEFICIENCIES** (2016)*
Source: Garden Grove Sanitary District

g) Would the project comply with federal, State, and local statutes and regulations related to solid waste?

Less-than-Significant Impact. The California Integrated Waste Management Act (AB 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995 and 50 percent by 2000. According to the City's General Plan Conservation Element, in 2005, approximately 199,737 tons of waste produced by the City was disposed in a landfill while 64 tons were burned at a waste-to-energy facility. Of this, household disposal consisted of 52 percent of waste disposal while business disposal consisted of 48 percent.

The proposed Project would comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, or Federal law. In addition, as discussed above, the proposed Project would not result in an excessive production of solid waste that would exceed the capacity of the existing landfill serving the project site. Therefore, the proposed Project would result in a less than significant impact related to Federal, State, and local statutes and regulations related to solid wastes. No mitigation would be required.

19. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a) Have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, 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) 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) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Findings of Fact

a) Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a

plant or animal community, 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 documented herein, the project site was previously developed as the former Garden Grove Mazda and Harbor Auto Center, among other things. The project site is located in an urban area. No portion of the project site or the immediately surrounding area contains an open body of water that serves as natural habitat in which fish could exist. Likewise, the project site is not suitable to support special-status species, and no known candidate, sensitive, or special-status species are known to inhabit the site. Due to the urban nature of the site and very limited on-site landscaping, there would be no impacts to candidate, sensitive, or special-status plant and animal species. Based on the Project Description and the preceding responses, implementation of the proposed Project does not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

No known historic features were known to have existed on the project. A physical inspection of the property reveals no evidence of the potential presence of any historic features, artifacts, or other resources thereupon.

Further, there is no indication that the project site presently has or once may have contained any archaeological resources. Any archaeological resources that may have once existed on and near the project site would have been eliminated and removed as a result of the site's former agricultural and commercial uses (and corresponding construction activities). Although there is little potential for the proposed Project to impact prehistoric resources due to significant prior disturbance from past grading and development activities, project construction would require grading and excavation activities that may extend into native soils. Therefore, Mitigation Measure CUL-1 outlines procedures to be followed in the unlikely event unknown archaeological resources are discovered at any time during grading and construction activities. Compliance with existing regulations (as required by Mitigation Measure CUL-1), would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

With regard to the potential presence of any vertebrate fossil localities within the general project area, for the reasons explained in the prior paragraph, it is unlikely fossil remains will be encountered. If fossil remains are uncovered, however, Mitigation Measure CUL-2 requires that a paleontologist be contacted to assess the discovery for scientific significance and to make recommendations regarding the necessity to develop paleontological mitigation. Mitigation Measure CUL-2 would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

And lastly, in an abundance of caution, the City has agreed to require Native American monitoring during ground-disturbing activities in native soil, even though the project site does not qualify as a "historical resource" as defined by CEQA. As such, the proposed Project would be required to adhere to Mitigation Measure TCR-1, which would reduce any potential impacts to previously undiscovered tribal cultural resources to a less than significant level.

With implementation of Mitigation Measures CUL-1, CUL-2, TCR-1, the proposed Project does not have the potential to 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)?

Less-than-Significant Impact*.* The project site is located in an urban area. The proposed Project calls for the approval, construction, and operation of a 124-room Hilton Hotel Project located at 13624-13650 Harbor Boulevard within the City of Garden Grove. The proposed Project would rely on and can be accommodated by the existing road system, public parks, public services, and utilities. Based on the Project Description and the preceding responses, impacts related to the proposed Project are less than significant or can be reduced to less than significant levels with incorporation of mitigation measures. The proposed Project's contribution to any significant cumulative impacts would be less than 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*.* The project site is located in an urban area. The proposed Project calls for the approval, construction, and operation of a 124-room Hilton Hotel Project located at 13624-13650 Harbor Boulevard within the City of Garden Grove. If the project is approved, the requested approvals include: (1) a general plan amendment; (2) a municipal code amendment; (3) a lot line adjustment; (4) site plan approval; and (5) conditional use permit.

The proposed Project would result in less than significant impacts with respect to aesthetics, agricultural resources, air quality, geology and soils, greenhouse gas emissions, hydrology and water quality, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. The proposed Project would also result in no impact to mineral resources, biological resources, and agricultural resources. The proposed Project, however, would result in less than significant impacts with mitigation incorporated to cultural resources, noise, hazards and hazardous materials, and tribal cultural resources.

Based on the Project Description and the preceding responses, development of the proposed Project would not cause substantial adverse effects to human beings because all potentially significant impacts of the proposed Project would be mitigated to a less than significant level.